

ORIGINAL

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 RICHARD W. WIEKING
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

6 SPENCER D. FREEMAN (*pro hac vice* pending)
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11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 FRASERSIDE HOLDINGS, LTD., a
 14 foreign limited liability company,

Case No:
CV 10

3585

Plaintiff,

COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF

vs.

17 METAINTERFACES, LLC, a California
 18 limited liability company,

Defendants.

21 Plaintiff Fraserside Holdings, Ltd., a foreign limited liability company with its
 22 principal place of business located at Office 1002, 10th Floor, Nicolaou Pentadromos
 23 Centre, Thessalonikis Street, 3025 Limassol, Cyprus (hereinafter "Plaintiff" or
 24 "Fraserside") brings this action against METAINTERFACES, LLC, a California
 25 limited liability company (hereinafter "Defendant" or "Metainterfaces"), with its
 26

1 principal place of business located in San Francisco, California, and alleges as
2 follows:

3 JURISDICTION AND VENUE

4 1. This is an action which arises under the Copyright Act, 17 U.S.C. § 101
5 *et seq.*, Section 32 of the Lanham Act, 15 U.S.C. §1114(1) (Direct Trademark
6 Infringement); and Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a) (False
7 Designation of Origin and Unfair Competition). This Court has jurisdiction over the
8 subject matter of this action pursuant to 28 U.S.C. §§ 1331, 1338(a) and (b).

9 2. This Court has original jurisdiction pursuant to 28 U.S.C. §§1331 and
10 1338(a), 17 U.S.C. § 501, 15 U.S.C. §1114(1), and 15 U.S.C. § 1125(a).

11 3. Personal jurisdiction and venue are proper in this District pursuant to 28
12 U.S.C. §1391(b), (c) and (d), and Federal Rule of Civil Procedure 4(k)(1) and (2).

13 PARTIES

14 4. Plaintiff is a foreign limited liability company with its principal place of
15 business in Limassol, Cyprus.

16 5. Defendant is a California limited liability company, with its principal
17 place of business in San Francisco, California.

18 FACTUAL BACKGROUND

19 6. Plaintiff Fraserside Holdings, Ltd is a Cyprus based company with
20 offices in Limassol, Cyprus

21 7. Fraserside is one of the world's leading producers of high quality brand
22 driven motion picture films. Fraserside motion pictures are distributed on a wide
23 range of platforms including mobile handsets via 104 network operators in 45
24 countries, digital TV via 38 platforms in 24 countries, broadband Internet, television
25 broadcasting and sold on DVD's.
26

1 8. Plaintiff's trademark and trade name "PRIVATE" as well as its
2 derivatives, logotypes, applications and modifications and all the additional
3 trademarks and applications are property of Cine Craft Ltd., without limitation, for all
4 related products and services are licensed internationally to use and license all
5 throughout the world in all formats, supports and distribution channels. For many
6 years, the purchasing public has come to know, rely upon and recognize the
7 trademark and trade name PRIVATE. Since in or around December 2003, Fraserside
8 has owned Cine Craft Ltd.

9 9. Plaintiff owns the worldwide rights to its extensive archive of high-
10 quality content and also licenses its trademarks internationally for a select range of
11 luxury consumer products.

12 10. Metainterfaces owns and operates multiple subscription based Internet
13 Web sites that display videos.

14 11. On May 11, 2009, Fraserside and Metainterfaces entered into a Content
15 Licensing Agreement (the "License Agreement") wherein Fraserside provided
16 Metainterfaces with 200 films in DVD format for the sole purpose of allowing
17 Metainterfaces to provide its customers access to stream digitized parts of the films or
18 complete films through Metainterfaces web sites. The License Agreement also
19 granted Metainterfaces rights to display the PRIVATE trademark on Metainterfaces'
20 web sites in conjunction with displaying the films.

21 12. The License Agreement specifically requires Metainterfaces to
22 periodically but consistently notify and update Fraserside on all Metainterfaces' web
23 sites that are providing Plaintiff's films to Metainterfaces' customers.

24 13. The License Agreement specifically forbids Metainterfaces from using
25 any Plaintiff film commercially for the benefit of any third party.
26

1 14. The License Agreement specifically forbids Metainterfaces from
2 permitting anyone, including Metainterfaces' affiliates, from using any portion of a
3 Plaintiff film in excess of two minutes as a promotional segment for Metainterfaces'
4 controlled Web sites.

5 15. The License Agreement specifically forbids Metainterfaces from giving
6 away Plaintiff films.

7 16. The License Agreement specifically requires MetaInterfaces to provide
8 Fraserside with a list of all Internet web sites MetaInterfaces is displaying Plaintiff
9 videos.

10 17. The License Agreement was executed in San Fransisco, California and
11 the parties consented to the jurisdiction of the Courts of California.

12 18. Plaintiff's PRIVATE trademark and service mark have been
13 continuously used in commerce since at least June 1968. U.S. Trademark
14 Registration No. 1014975 was registered on July 1, 1975 and renewed on September
15 6, 2005.

16 19. Plaintiff has expended considerable effort and expense in promoting its
17 trademark and the goods sold under the trademark PRIVATE. As a result, the
18 purchasing public has come to know, rely upon and recognize the mark PRIVATE as
19 an international brand of high quality entertainment.

20 20. Plaintiff's "PRIVATE GOLD" trademark and service mark have been
21 continuously used in commerce since at least August 2004. U.S. Trademark
22 Registration No. 3188677 was registered on December 26, 2006.

23 21. Plaintiff has expended considerable effort and expense in promoting its
24 trademark and the goods sold under the trademark PRIVATE GOLD. As a result, the
25 purchasing public has come to know, rely upon and recognize the mark PRIVATE
26 GOLD as an international brand of high quality entertainment.

1 22. Plaintiff's PRIVATE trademark and service mark design of two human
2 female figures has been continuously used in commerce since at least December
3 2004. U.S. Trademark Registration No. 3389749 was registered on February 26,
4 2008.

5 23. Plaintiff has expended considerable effort and expense in promoting its
6 trademark and the goods sold under the trademark service mark design of two human
7 female figures. As a result, the purchasing public has come to know, rely upon and
8 recognize the mark design of two human female figures as indentifying Plaintiff's
9 work, an international brand of high quality entertainment.

10 24. Plaintiff's PIRATE trademark and service mark has been continuously
11 used in commerce since at least February 24, 2000. U.S. Trademark Registration No.
12 3137445 was registered on September 5, 2006.

13 25. Plaintiff has expended considerable effort and expense in promoting its
14 trademark and the goods sold under the trademark service mark PIRATE. As a
15 result, the purchasing public has come to know, rely upon and recognize the mark
16 PIRATE as an international brand of high quality entertainment.

17 26. Plaintiff's trademarks and service marks discussed herein were
18 distinctive at the time of Defendant's use and remains distinctive today.

19
20 **DEFENDANT'S UNLAWFUL CONDUCT**

21 27. In May 2010, it was discovered that over 250 separate instances of
22 copyright infringement and multiple separate and distinct instances of trademark
23 infringement of Plaintiff's intellectual property existed on multiple web sites owned
24 and controlled by MetaInterfaces or, if not so owned and controlled, web sites
25 specifically and intentionally directing Internet users to web sites owned and
26 controlled by MetaInterfaces.

28. The manner in which the infringing Internet web sites are operated prevents a general user and/or observer from determining whether MetaInterfaces actually owns and/or controls the site or the site is that of a third party displaying Plaintiff's videos provided by Metainterfaces.

29. In the instances where MetaInterfaces owned and controlled the web site displaying Plaintiff's videos, MetaInterfaces is governed by terms of the licensing agreement that prevent and prohibit MetaInterfaces from utilizing Plaintiff's videos for the benefit of third parties in any manner.

30. In the instances where the Internet web sites displaying are owned and controlled by third parties, the Plaintiff's videos are provided by MetaInterfaces, and MetaInterfaces is governed by the terms of the licensing agreement that prevents and prohibits MetaInterfaces from giving away, Plaintiff's videos and permitting any affiliate, or other person/entity directing Internet traffic to MetaInterfaces' web sites, to use more than two minutes of a Plaintiff video.

www.skimtube.com

31. On the Internet web site located at www.skimtube.com, Plaintiff videos are displayed.

32. Defendants have incorporated a business model which uses infringing content to attract a high volume of visitors to the site for the purpose of selling advertising.

33. In the locations on www.skintube.com where Plaintiff videos are displayed, advertisements for third party vendors are displayed. The Plaintiff videos specifically benefit those third party advertisers.

34. When a user initiates any Plaintiff video on www.skimtube.com, a third party advertisement displays **over the Plaintiff's video** at the start of the video, at any pause of the video, and at the end of the video. The display over the Plaintiff

1 video requires direct interaction from the user in order to further display the Plaintiff
2 video. If the user does not click on a very specific location to close the
3 advertisement, the user is directed to a third party website. Plaintiff video is also
4 surrounded by additional third party advertising.

5 35. Each Plaintiff video displayed on www.skimtube.com exceeds nine (9)
6 minutes in length.

7 36. Each Plaintiff video displayed on www.skimtube.com is accompanied
8 with a specific statement that the video is provided "By: X-Movie," and specific link
9 to www.xmovie.com, which is owned and controlled by MetaInterfaces.

10 37. In May 2010, www.skimtube.com displayed and offered for viewing
11 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number
12 PA1-670-905, specifically located at
13 <http://skimtube.com/index.php?search=anal%20mermaids>. This copyrighted work
14 was displayed in this manner without the consent of, or licensing by, Fraserside, the
15 copyright owner and registrant of the motion picture. The Content Licensing
16 Agreement specifically prohibited MetaInterface's display in this manner or
17 MetaInterfaces permission and/or authorization for such display.

18 38. In May 2010, www.skimtube.com displayed and offered for viewing
19 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number
20 PA1-670-905, specifically located at [http://www.skimtube.com/68969-Barbara-](http://www.skimtube.com/68969-Barbara-Voice-And-Sintia-Stone-Anal-Mermaids.htm)
21 [Voice-And-Sintia-Stone-Anal-Mermaids.htm](http://www.skimtube.com/68969-Barbara-Voice-And-Sintia-Stone-Anal-Mermaids.htm). This copyrighted work was displayed
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1 39. In May 2010, www.skimtube.com displayed and offered for viewing
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9 40. In May 2010, www.skimtube.com displayed and offered for viewing
10 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number
11 PA1-670-905, specifically located at [http://www.skimtube.com/68664-Monika-Unco-](http://www.skimtube.com/68664-Monika-Unco-Anal-Mermaids.htm)
12 [Anal-Mermaids.htm](http://www.skimtube.com/68664-Monika-Unco-Anal-Mermaids.htm). This copyrighted work was displayed in this manner without
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17 41. In May 2010, www.skimtube.com displayed and offered for viewing
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25 42. In May 2010, www.skimtube.com displayed and offered for viewing
26 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number

1 PA1-670-905, specifically located at [http://www.skimtube.com/68524-Maya-Gold-](http://www.skimtube.com/68524-Maya-Gold-Anal-Mermaids.htm)
2 [Anal-Mermaids.htm](http://www.skimtube.com/68524-Maya-Gold-Anal-Mermaids.htm). This copyrighted work was displayed in this manner without
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15 44. In May 2010, www.skimtube.com displayed and offered for viewing
16 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number
17 PA1-670-905, specifically located at [http://www.skimtube.com/68791-Dorina-And-](http://www.skimtube.com/68791-Dorina-And-Judith-Kostner-Anal-Mermaids.htm)
18 [Judith-Kostner-Anal-Mermaids.htm](http://www.skimtube.com/68791-Dorina-And-Judith-Kostner-Anal-Mermaids.htm). This copyrighted work was displayed in this
19 manner without the consent of, or licensing by, Fraserside, the copyright owner and
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23 45. In May 2010, www.skimtube.com displayed and offered for viewing
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5 46. In May 2010, www.skimtube.com displayed and offered for viewing
6 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number
7 PA1-670-905, specifically located at [http://www.skimtube.com/68523-Maya-Gold-](http://www.skimtube.com/68523-Maya-Gold-Anal-Mermaids.htm)
8 [Anal-Mermaids.htm](http://www.skimtube.com/68523-Maya-Gold-Anal-Mermaids.htm). This copyrighted work was displayed in this manner without
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10 motion picture. The Content Licensing Agreement specifically prohibited
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13 47. In May 2010, www.skimtube.com displayed and offered for viewing
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15 PA1-670-905, specifically located at
16 <http://skimtube.com/index.php?search=anal%20mermaids>. This copyrighted work
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21 48. In May 2010, www.skimtube.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number
23 PA1-670-905, specifically located at [http://www.skimtube.com/68579-Eva-](http://www.skimtube.com/68579-Eva-Mercedes-Anal-Mermaids.htm)
24 [Mercedes-Anal-Mermaids.htm](http://www.skimtube.com/68579-Eva-Mercedes-Anal-Mermaids.htm). This copyrighted work was displayed in this manner
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3 49. In May 2010, www.skimtube.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Anal Mermaids, Copyright Registration Number
5 PA1-670-905, specifically located at [http://www.skimtube.com/68580-Eva-](http://www.skimtube.com/68580-Eva-Mercedes-Anal-Mermaids.htm)
6 [Mercedes-Anal-Mermaids.htm](http://www.skimtube.com/68580-Eva-Mercedes-Anal-Mermaids.htm). This copyrighted work was displayed in this manner
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19 51. In May 2010, www.skimtube.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Anal Freedom, Copyright Registration Number
21 PA1-674-266, specifically located at
22 <http://skimtube.com/index.php?search=anal%20freedom>. This copyrighted work was
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1 52. In May 2010, www.skimtube.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Anal Freedom, Copyright Registration Number
3 PA1-674-266, specifically located at [http://www.skimtube.com/54742-Sadie-Jane-](http://www.skimtube.com/54742-Sadie-Jane-And-Naudia-Rio-Anal-Freedom.htm)
4 [And-Naudia-Rio-Anal-Freedom.htm](http://www.skimtube.com/54742-Sadie-Jane-And-Naudia-Rio-Anal-Freedom.htm). This copyrighted work was displayed in this
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9 53. In May 2010, www.skimtube.com displayed and offered for viewing
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12 <http://skimtube.com/index.php?search=anal%20freedom>. This copyrighted work was
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17 54. In May 2010, www.skimtube.com displayed and offered for viewing
18 Fraserside's copyrighted work titled Anal Freedom, Copyright Registration Number
19 PA1-674-266, specifically located at [http://www.skimtube.com/54710-Naudia-Rio-](http://www.skimtube.com/54710-Naudia-Rio-Anal-Freedom.htm)
20 [Anal-Freedom.htm](http://www.skimtube.com/54710-Naudia-Rio-Anal-Freedom.htm). This copyrighted work was displayed in this manner without the
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25 55. In May 2010, www.skimtube.com displayed and offered for viewing
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2 <http://skimtube.com/index.php?search=anal%20freedom>. This copyrighted work was
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7 56. In May 2010, www.skimtube.com displayed and offered for viewing
8 Fraserside's copyrighted work titled Anal Freedom, Copyright Registration Number
9 PA1-674-266, specifically located at [http://www.skimtube.com/54657-Vanilla-Skye-](http://www.skimtube.com/54657-Vanilla-Skye-Anal-Freedom.htm)
10 [Anal-Freedom.htm](http://www.skimtube.com/54657-Vanilla-Skye-Anal-Freedom.htm). This copyrighted work was displayed in this manner without the
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15 57. In May 2010, www.skimtube.com displayed and offered for viewing
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23 58. In May 2010, www.skimtube.com displayed and offered for viewing
24 Fraserside's copyrighted work titled Anal Freedom, Copyright Registration Number
25 PA1-674-266, specifically located at [http://www.skimtube.com/54665-Kat-Anal-](http://www.skimtube.com/54665-Kat-Anal-Freedom.htm)
26 [Freedom.htm](http://www.skimtube.com/54665-Kat-Anal-Freedom.htm). This copyrighted work was displayed in this manner without the

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5 59. In May 2010, www.skimtube.com displayed and offered for viewing
6 Fraserside's copyrighted work titled Anal Freedom, Copyright Registration Number
7 PA1-674-266, specifically located at [http://www.skimtube.com/54643-Venus-Anal-](http://www.skimtube.com/54643-Venus-Anal-Freedom.htm)
8 [Freedom.htm](http://www.skimtube.com/54643-Venus-Anal-Freedom.htm). This copyrighted work was displayed in this manner without the
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21 61. In May 2010, www.skimtube.com displayed and offered for viewing
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23 PA1-674-266, specifically located at [http://www.skimtube.com/54643-Venus-Anal-](http://www.skimtube.com/54643-Venus-Anal-Freedom.htm)
24 [Freedom.htm](http://www.skimtube.com/54643-Venus-Anal-Freedom.htm). This copyrighted work was displayed in this manner without the
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3 62. In May 2010, www.skimtube.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Anal Freedom, Copyright Registration Number
5 PA1-674-266, specifically located at [http://www.skimtube.com/54637-Melissa-](http://www.skimtube.com/54637-Melissa-Lauren-Anal-Freedom.htm)
6 [Lauren-Anal-Freedom.htm](http://www.skimtube.com/54637-Melissa-Lauren-Anal-Freedom.htm). This copyrighted work was displayed in this manner
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11 63. In May 2010, www.skimtube.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Beauties In The Tropix, Copyright Registration
13 Number PA1-674-265, specifically located at
14 <http://www.skimtube.com/index.php?search=Beauties%20in%20the%20tropix>. This
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20 Fraserside's copyrighted work titled Beauties In The Tropix, Copyright Registration
21 Number PA1-674-265, specifically located at [http://www.skimtube.com/56940-](http://www.skimtube.com/56940-Donna-Marie-Beauties-In-The-Tropix.htm)
22 [Donna-Marie-Beauties-In-The-Tropix.htm](http://www.skimtube.com/56940-Donna-Marie-Beauties-In-The-Tropix.htm). This copyrighted work was displayed in
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11 Number PA1-674-265, specifically located at [http://www.skimtube.com/57004-](http://www.skimtube.com/57004-Suzie-Carina-And-Veronica-Da-Souza-Beauties-In-The-Tropix.htm)
12 [Suzie-Carina-And-Veronica-Da-Souza-Beauties-In-The-Tropix.htm](http://www.skimtube.com/57004-Suzie-Carina-And-Veronica-Da-Souza-Beauties-In-The-Tropix.htm). This
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1 Number PA1-674-265, specifically located at [http://www.skimtube.com/56976-](http://www.skimtube.com/56976-Suzie-Carina-Beauties-In-The-Tropix.htm)
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18 [Suzie-Carina-Beauties-In-The-Tropix---Scene-2.htm](http://www.skimtube.com/118382-Suzie-Carina-Beauties-In-The-Tropix---Scene-2.htm). This copyrighted work was
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8 [Jennifer-S-And-Thalia-Beauties-In-The-Tropix.htm](http://www.skimtube.com/57079-Jennifer-S-And-Thalia-Beauties-In-The-Tropix.htm). This copyrighted work was
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5 [Conde-And-Miercole-The-Fetish-Garden.htm](http://www.skimtube.com/77574-Bibian-Norai-And-Christina-Bella-And-Malena-Conde-And-Miercole-The-Fetish-Garden.htm). This copyrighted work was displayed
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2 [And-Rita-Faltoyno-And-Tina-T-Gladiator.htm](http://www.skimtube.com/59494-Dorothy-Black-And-Rita-Faltoyno-And-Tina-T-Gladiator.htm). This copyrighted work was
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14 [Lily-Love-A-Taste-Of-Pleasure---Scene-2.htm](http://www.skimtube.com/118487-Lily-Love-A-Taste-Of-Pleasure---Scene-2.htm). This copyrighted work was
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25 [Shine-Dominatrix-Chess-Gambit.htm](http://www.skimtube.com/79578-Melinda-Vecsey-And-Michelle-Wild-And-Orsi-Shine-Dominatrix-Chess-Gambit.htm). This copyrighted work was displayed in this
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8 [Wild-Dominatrix-Chess-Gambit.htm](http://www.skimtube.com/79517-Dora-Venter-And-Jessica-Mark-And-Michelle-Wild-Dominatrix-Chess-Gambit.htm). This copyrighted work was displayed in this
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3 107. In May 2010, www.skimtube.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
5 PA1-672-445, specifically located at [http://www.skimtube.com/90001-Lucy-Love-
6 And-Priva-Sexy-Business.htm](http://www.skimtube.com/90001-Lucy-Love-And-Priva-Sexy-Business.htm). This copyrighted work was displayed in this manner
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11 108. In May 2010, www.skimtube.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
13 PA1-672-445, specifically located at [http://www.skimtube.com/89396-Katin-Sexy-
14 Business.htm](http://www.skimtube.com/89396-Katin-Sexy-Business.htm). This copyrighted work was displayed in this manner without the
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19 109. In May 2010, www.skimtube.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
21 PA1-672-445, specifically located at [http://www.skimtube.com/89735-Jamie-Brooks-
22 And-Mandy-Saxo-Sexy-Business.htm](http://www.skimtube.com/89735-Jamie-Brooks-And-Mandy-Saxo-Sexy-Business.htm). This copyrighted work was displayed in this
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1 110. In May 2010, www.skimtube.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
3 PA1-672-445, specifically located at [http://www.skimtube.com/89788-Angelina-Sky-](http://www.skimtube.com/89788-Angelina-Sky-Sexy-Business.htm)
4 [Sexy-Business.htm](http://www.skimtube.com/89788-Angelina-Sky-Sexy-Business.htm). This copyrighted work was displayed in this manner without the
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9 111. In May 2010, www.skimtube.com displayed and offered for viewing
10 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
11 PA1-672-445, specifically located at [http://www.skimtube.com/89621-Nikki-Nite-](http://www.skimtube.com/89621-Nikki-Nite-Sexy-Business.htm)
12 [Sexy-Business.htm](http://www.skimtube.com/89621-Nikki-Nite-Sexy-Business.htm). This copyrighted work was displayed in this manner without the
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17 112. In May 2010, www.skimtube.com displayed and offered for viewing
18 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
19 PA1-670-893, specifically located at
20 <http://www.skimtube.com/index.php?search=tropical%20twins>. This copyrighted
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25 113. In May 2010, www.skimtube.com displayed and offered for viewing
26 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number

1 PA1-670-893, specifically located at <http://www.skimtube.com/89669-Sharka-Blue->
2 [And-Liliane-Tiger-Tropical-Twins.htm](http://www.skimtube.com/89669-Sharka-Blue-And-Liliane-Tiger-Tropical-Twins.htm). This copyrighted work was displayed in this
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7 114. In May 2010, www.skimtube.com displayed and offered for viewing
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9 PA1-670-893, specifically located at <http://www.skimtube.com/89650-Melany-Jolie->
10 [Tropical-Twins.htm](http://www.skimtube.com/89650-Melany-Jolie-Tropical-Twins.htm). This copyrighted work was displayed in this manner without
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15 115. In May 2010, www.skimtube.com displayed and offered for viewing
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17 PA1-670-893, specifically located at <http://www.skimtube.com/89900-Jane-Darling->
18 [And-Priva-Tropical-Twins.htm](http://www.skimtube.com/89900-Jane-Darling-And-Priva-Tropical-Twins.htm). This copyrighted work was displayed in this manner
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23 116. In May 2010, www.skimtube.com displayed and offered for viewing
24 Fraserside's copyrighted work titled Guns and Rough Sex, Copyright Registration
25 Number PA1-670-901, specifically located at
26 <http://www.skimtube.com/index.php?search=guns%20and>. This copyrighted work

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5 117. In May 2010, www.skimtube.com displayed and offered for viewing
6 Fraserside's copyrighted work titled Guns and Rough Sex, Copyright Registration
7 Number PA1-670-901, specifically located at [http://www.skimtube.com/74524-](http://www.skimtube.com/74524-Michelle-Wild-Guns-And-Rough-Sex.htm)
8 [Michelle-Wild-Guns-And-Rough-Sex.htm](http://www.skimtube.com/74524-Michelle-Wild-Guns-And-Rough-Sex.htm). This copyrighted work was displayed in
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13 118. In May 2010, www.skimtube.com displayed and offered for viewing
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15 Number PA1-677-516, specifically located at
16 <http://www.skimtube.com/index.php?search=forbidden%20games>. This copyrighted
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21 119. In May 2010, www.skimtube.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
23 Number PA1-677-516, specifically located at [http://www.skimtube.com/77919-Dora-](http://www.skimtube.com/77919-Dora-Venter-Forbidden-Games.htm)
24 [Venter-Forbidden-Games.htm](http://www.skimtube.com/77919-Dora-Venter-Forbidden-Games.htm). This copyrighted work was displayed in this manner
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3 120. In May 2010, www.skimtube.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
5 Number PA1-677-516, specifically located at [http://www.skimtube.com/78082-](http://www.skimtube.com/78082-Monica-Sweetheart-Forbidden-Games.htm)
6 [Monica-Sweetheart-Forbidden-Games.htm](http://www.skimtube.com/78082-Monica-Sweetheart-Forbidden-Games.htm). This copyrighted work was displayed in
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11 121. In May 2010, www.skimtube.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
13 Number PA1-677-516, specifically located at [http://www.skimtube.com/77545-Tera-](http://www.skimtube.com/77545-Tera-Joy-Forbidden-Games.htm)
14 [Joy-Forbidden-Games.htm](http://www.skimtube.com/77545-Tera-Joy-Forbidden-Games.htm). This copyrighted work was displayed in this manner
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19 122. In May 2010, www.skimtube.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Paintball Warriors, Copyright Registration
21 Number PA1-675-815, specifically located at
22 <http://www.skimtube.com/index.php?search=paintball%20warriors>. This
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1 123. In May 2010, www.skimtube.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Paintball Warriors, Copyright Registration
3 Number PA1-675-815, specifically located at [http://www.skimtube.com/57789-](http://www.skimtube.com/57789-Diana-Gold-Paintball-Warriors.htm)
4 [Diana-Gold-Paintball-Warriors.htm](http://www.skimtube.com/57789-Diana-Gold-Paintball-Warriors.htm). This copyrighted work was displayed in this
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9 124. In May 2010, www.skimtube.com displayed and offered for viewing
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11 Number PA1-675-596, specifically located at
12 <http://www.skimtube.com/index.php?search=dangerous%20curves>. This copyrighted
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17 125. In May 2010, www.skimtube.com displayed and offered for viewing
18 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
19 Number PA1-675-596, specifically located at [http://www.skimtube.com/78070-](http://www.skimtube.com/78070-Gabriella-Tchekan-Dangerous-Curves.htm)
20 [Gabriella-Tchekan-Dangerous-Curves.htm](http://www.skimtube.com/78070-Gabriella-Tchekan-Dangerous-Curves.htm). This copyrighted work was displayed in
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25 126. In May 2010, www.skimtube.com displayed and offered for viewing
26 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration

1 Number PA1-675-596, specifically located at [http://www.skimtube.com/77880-](http://www.skimtube.com/77880-Suzie-Sweet-Dangerous-Curves.htm)
2 [Suzie-Sweet-Dangerous-Curves.htm](http://www.skimtube.com/77880-Suzie-Sweet-Dangerous-Curves.htm). This copyrighted work was displayed in this
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7 127. In May 2010, www.skimtube.com displayed and offered for viewing
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9 Number PA1-675-596, specifically located at [http://www.skimtube.com/77676-Jane-](http://www.skimtube.com/77676-Jane-Darling-Dangerous-Curves.htm)
10 [Darling-Dangerous-Curves.htm](http://www.skimtube.com/77676-Jane-Darling-Dangerous-Curves.htm). This copyrighted work was displayed in this manner
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15 128. In May 2010, www.skimtube.com displayed and offered for viewing
16 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
17 Number PA1-675-596, specifically located at [http://www.skimtube.com/77642-](http://www.skimtube.com/77642-Gabriella-Bond-Dangerous-Curves.htm)
18 [Gabriella-Bond-Dangerous-Curves.htm](http://www.skimtube.com/77642-Gabriella-Bond-Dangerous-Curves.htm). This copyrighted work was displayed in this
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23 129. In May 2010, www.skimtube.com displayed and offered for viewing
24 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
25 Number PA1-675-596, specifically located at [http://www.skimtube.com/77606-](http://www.skimtube.com/77606-Cecile-Dangerous-Curves.htm)
26 [Cecile-Dangerous-Curves.htm](http://www.skimtube.com/77606-Cecile-Dangerous-Curves.htm). This copyrighted work was displayed in this manner

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5 130. In May 2010, www.skimtube.com displayed and offered for viewing
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7 Number PA1-675-596, specifically located at [http://www.skimtube.com/77918-](http://www.skimtube.com/77918-Vanessa-Dangerous-Cur)
8 Vanessa-Dangerous-Cur. This copyrighted work was displayed in this manner
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13 131. In May 2010, www.skimtube.com displayed and offered for viewing
14 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
15 Number PA1-675-596, specifically located at [http://www.skimtube.com/77745-](http://www.skimtube.com/77745-Laura-Lion-And-Stacy-Silver-Dangerous-Curves.htm)
16 Laura-Lion-And-Stacy-Silver-Dangerous-Curves.htm. This copyrighted work was
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21 132. In May 2010, www.skimtube.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
23 670-897, specifically located at <http://skimtube.com/index.php?search=tenerife>. This
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3 133. In May 2010, www.skimtube.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
5 670-897, specifically located at [http://www.skimtube.com/89751-Lara-Stevens-And-](http://www.skimtube.com/89751-Lara-Stevens-And-Priva-Tenerife.htm)
6 [Priva-Tenerife.htm](http://www.skimtube.com/89751-Lara-Stevens-And-Priva-Tenerife.htm). This copyrighted work was displayed in this manner without the
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11 134. In May 2010, www.skimtube.com displayed and offered for viewing
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18 135. In May 2010, www.skimtube.com displayed and offered for viewing
19 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
20 670-897, specifically located at [http://www.skimtube.com/89672-Lara-Stevens-](http://www.skimtube.com/89672-Lara-Stevens-Tenerife.htm)
21 [Tenerife.htm](http://www.skimtube.com/89672-Lara-Stevens-Tenerife.htm). This copyrighted work was displayed in this manner without the
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1 136. In May 2010, www.skimtube.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
3 670-897, specifically located at [http://www.skimtube.com/89949-Jane-Darling-](http://www.skimtube.com/89949-Jane-Darling-Tenerife.htm)
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9 137. In May 2010, www.skimtube.com displayed and offered for viewing
10 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
11 670-897, specifically located at [http://www.skimtube.com/89516-Jane-Darling-And-](http://www.skimtube.com/89516-Jane-Darling-And-Silvia-Saint-Tenerife.htm)
12 Silvia-Saint-Tenerife.htm. This copyrighted work was displayed in this manner
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17 138. In May 2010, www.skimtube.com displayed and offered for viewing
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19 670-897, specifically located at [http://www.skimtube.com/89565-Angel-Felon-And-](http://www.skimtube.com/89565-Angel-Felon-And-Melissa-Black-Tenerife.htm)
20 Melissa-Black-Tenerife.htm. This copyrighted work was displayed in this manner
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25 139. In May 2010, www.skimtube.com displayed and offered for viewing
26 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration

1 Number PA1-670-895, specifically located at
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7 140. In May 2010, www.skimtube.com displayed and offered for viewing
8 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
9 Number PA1-670-895, specifically located at [http://www.skimtube.com/61909-](http://www.skimtube.com/61909-Sophie-Moone-The-Girls-Of-Desire.htm)
10 [Sophie-Moone-The-Girls-Of-Desire.htm](http://www.skimtube.com/61909-Sophie-Moone-The-Girls-Of-Desire.htm). This copyrighted work was displayed in
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15 141. In May 2010, www.skimtube.com displayed and offered for viewing
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17 Number PA1-670-895, specifically located at
18 <http://www.skimtube.com/index.php?search=the%20girls%20of%20desire>. This
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23 142. In May 2010, www.skimtube.com displayed and offered for viewing
24 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
25 Number PA1-670-895, specifically located at [http://www.skimtube.com/61749-](http://www.skimtube.com/61749-Alexa-Weix-And-Bianca-And-Nikki-Black-The-Girls-Of-Desire.htm)
26 [Alexa-Weix-And-Bianca-And-Nikki-Black-The-Girls-Of-Desire.htm](http://www.skimtube.com/61749-Alexa-Weix-And-Bianca-And-Nikki-Black-The-Girls-Of-Desire.htm). This

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5 143. In May 2010, www.skimtube.com displayed and offered for viewing
6 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
7 Number PA1-670-895, specifically located at [http://www.skimtube.com/62139-Lucy-](http://www.skimtube.com/62139-Lucy-Lee-The-Girls-Of-Desire.htm)
8 [Lee-The-Girls-Of-Desire.htm](http://www.skimtube.com/62139-Lucy-Lee-The-Girls-Of-Desire.htm). This copyrighted work was displayed in this manner
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12 authorization for such display.

13 144. In May 2010, www.skimtube.com displayed and offered for viewing
14 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
15 Number PA1-670-895, specifically located at [http://www.skimtube.com/62228-](http://www.skimtube.com/62228-Carmen-White-And-Michelle-Wild-The-Girls-Of-Desire.htm)
16 [Carmen-White-And-Michelle-Wild-The-Girls-Of-Desire.htm](http://www.skimtube.com/62228-Carmen-White-And-Michelle-Wild-The-Girls-Of-Desire.htm). This copyrighted work
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21 145. In May 2010, www.skimtube.com displayed and offered for viewing
22 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
23 Number PA1-670-895, specifically located at
24 <http://www.skimtube.com/index.php?search=the%20girls%20of%20desire>. This
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3 146. In May 2010, www.skimtube.com displayed and offered for viewing
4 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
5 Number PA1-670-895, specifically located at [http://www.skimtube.com/57515-](http://www.skimtube.com/57515-Fabiola-Dos-Santos-The-Girls-Of-Desire.htm)
6 [Fabiola-Dos-Santos-The-Girls-Of-Desire.htm](http://www.skimtube.com/57515-Fabiola-Dos-Santos-The-Girls-Of-Desire.htm). This copyrighted work was displayed
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8 owner and registrant of the motion picture. The Content Licensing Agreement
9 specifically prohibited MetaInterface's display in this manner or MetaInterfaces
10 permission and/or authorization for such display.

11 147. In May 2010, on its Internet Web site page, specifically located at
12 <http://www.skimtube.com/index.php?search=GLADIATOR>, www.skimtube.com
13 displayed and/or utilized Plaintiff's trademarks PRIVATE, Registration Number
14 1014957. Plaintiff's trademarks were infringed in this manner as they were displayed
15 without the consent of, or licensing by, the Plaintiff, the trademark owner and
16 registrant of the trademark.

17 **www.eskimotube.com**

18 148. On the Internet web site located at www.eskimotube.com, Plaintiff
19 videos are displayed.

20 149. Defendants have incorporated a business model which uses infringing
21 content to attract a high volume of visitors to the site for the purpose of selling
22 advertising.

23 150. In the locations on www.eskimotube.com where Plaintiff's copyrighted
24 works are displayed, advertisements for third party vendors are displayed. Plaintiff's
25 videos specifically benefit those third party advertisers.
26

1 151. When the user initiates any Plaintiff video on www.eskimotube.com, a
2 third party advertisement displays over the video at any pause of the video, and at the
3 end of the video. The display over the Plaintiff video requires direct interaction from
4 the user in order to further display the Plaintiff video. If the user does not click on a
5 specific location to close advertisement, user is directed to a third party website.
6 Plaintiff video is also surrounded by additional third party advertising.

7 152. Under each Plaintiff displayed video is text that states "Watch and
8 download in HD: HQ WMV | HQ MP4 | DVD | IPHONE/IPOD/PSP". This text is
9 linked to a third party subscription based website. HD is an internationally known
10 term for High Definition. This advertisement entices user into believing that
11 Plaintiff's content, for a fee, can be viewed in various formats and quality on such
12 third party site. Plaintiff's content is being used in a "bait and switch" scheme.

13 153. Each Plaintiff video displayed on www.eskimotube.com exceeds two
14 minutes.

15 154. Each Plaintiff video displayed on www.eskimotube.com is accompanied
16 with a specific statement, "Download Full Scene at: X-Movie," and specific link to
17 www.xmovie.com, which is owned and controlled by MetaInterfaces.

18 155. In May 2010, www.eskimotube.com displayed and offered for viewing
19 Fraserside's copyrighted work titled A Taste of Pleasure, Copyright Registration
20 Number PA1-674-267, specifically located at
21 http://eskimotube.com/show.php?search=a%20taste%20of%20pleasure. This
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1 156. In May 2010, www.eskimotube.com displayed and offered for viewing
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3 Number PA1-674-267, specifically located at
4 <http://eskimotube.com/show.php?search=a%20taste%20of%20pleasure>, in a manner
5 which permitted and/or allowed the user to copy the embedded code of the Plaintiff
6 film and thereafter display the film in any manner or location desired by the user.
7 This copyrighted work was displayed in this manner without the consent of, or
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9 The Content Licensing Agreement specifically prohibited MetaInterface's display in
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11 157. In May 2010, www.eskimotube.com displayed and offered for viewing
12 Fraserside's copyrighted work titled A Taste of Pleasure, Copyright Registration
13 Number PA1-674-267, specifically located at [http://eskimotube.com/118487-Lily-](http://eskimotube.com/118487-Lily-Love-A-Taste-Of-Pleasure---Scene-2.html?th=1)
14 [Love-A-Taste-Of-Pleasure---Scene-2.html?th=1](http://eskimotube.com/118487-Lily-Love-A-Taste-Of-Pleasure---Scene-2.html?th=1). This copyrighted work was
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19 158. In May 2010, www.eskimotube.com displayed and offered for viewing
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21 Number PA1-674-267, specifically located at [http://eskimotube.com/118487-Lily-](http://eskimotube.com/118487-Lily-Love-A-Taste-Of-Pleasure---Scene-2.html?th=1)
22 [Love-A-Taste-Of-Pleasure---Scene-2.html?th=1](http://eskimotube.com/118487-Lily-Love-A-Taste-Of-Pleasure---Scene-2.html?th=1), in a manner which permitted and/or
23 allowed the user to copy the embedded code of the Plaintiff film and thereafter
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3 159. In May 2010, www.eskimotube.com displayed and offered for viewing
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5 Number PA1-674-267, specifically located at [http://eskimotube.com/118802-Black-](http://eskimotube.com/118802-Black-Diamond-A-Taste-Of-Pleasure---Scene-5.html?th=1)
6 [Diamond-A-Taste-Of-Pleasure---Scene-5.html?th=1](http://eskimotube.com/118802-Black-Diamond-A-Taste-Of-Pleasure---Scene-5.html?th=1). This copyrighted work was
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13 Number PA1-674-267, specifically located at [http://eskimotube.com/118802-Black-](http://eskimotube.com/118802-Black-Diamond-A-Taste-Of-Pleasure---Scene-5.html?th=1)
14 [Diamond-A-Taste-Of-Pleasure---Scene-5.html?th=1](http://eskimotube.com/118802-Black-Diamond-A-Taste-Of-Pleasure---Scene-5.html?th=1), in a manner which permitted
15 and/or allowed the user to copy the embedded code of the Plaintiff film and thereafter
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3 162. In May 2010, www.eskimotube.com displayed and offered for viewing
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5 PA1-674-266, specifically located at [http://eskimotube.com/54742-Sadie-Jane-And-](http://eskimotube.com/54742-Sadie-Jane-And-Naudia-Rio-Anal-Freedom.html?th=1)
6 [Naudia-Rio-Anal-Freedom.html?th=1](http://eskimotube.com/54742-Sadie-Jane-And-Naudia-Rio-Anal-Freedom.html?th=1). This copyrighted work was displayed in this
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14 [Freedom.html?th=1](http://eskimotube.com/54710-Naudia-Rio-Anal-Freedom.html?th=1). This copyrighted work was displayed in this manner without the
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22 [Anal-Freedom.html?th=1](http://eskimotube.com/54637-Melissa-Lauren-Anal-Freedom.html?th=1). This copyrighted work was displayed in this manner
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12 [Freedom.html?th=1](http://eskimotube.com/54665-Kat-Anal-Freedom.html?th=1). This copyrighted work was displayed in this manner without the
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1 PA1-670-905, specifically located at [http://eskimotube.com/68579-Eva-Mercedes-](http://eskimotube.com/68579-Eva-Mercedes-Anal-Mermaids.html?th=1)
2 [Anal-Mermaids.html?th=1](http://eskimotube.com/68579-Eva-Mercedes-Anal-Mermaids.html?th=1). This copyrighted work was displayed in this manner
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18 [Anal-Mermaids.html?th=1](http://eskimotube.com/68580-Eva-Mercedes-Anal-Mermaids.html?th=1). This copyrighted work was displayed in this manner
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7 PA1-670-905, specifically located at [http://eskimotube.com/68664-Monika-Unco-](http://eskimotube.com/68664-Monika-Unco-Anal-Mermaids.html?th=4)
8 [Anal-Mermaids.html?th=4](http://eskimotube.com/68664-Monika-Unco-Anal-Mermaids.html?th=4). This copyrighted work was displayed in this manner
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4 [Judith-Kostner-Anal-Mermaids.html?th=2](http://eskimotube.com/68791-Dorina-And-Judith-Kostner-Anal-Mermaids.html?th=2). This copyrighted work was displayed in
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20 [And-Sintia-Stone-Anal-Mermaids.html?th=1](http://eskimotube.com/68969-Barbara-Voice-And-Sintia-Stone-Anal-Mermaids.html?th=1). This copyrighted work was displayed
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26 Carina-And-Veronica-Da-Souza-Beauties-In-The-Tropix.html?th=1](http://eskimotube.com/57004-Suzie-Carina-And-Veronica-Da-Souza-Beauties-In-The-Tropix.html?th=1). This

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7 Number PA1-674-265, specifically located at [http://eskimotube.com/56940-Donna-](http://eskimotube.com/56940-Donna-Marie-Beauties-In-The-Tropix.html?th=1)
8 [Marie-Beauties-In-The-Tropix.html?th=1](http://eskimotube.com/56940-Donna-Marie-Beauties-In-The-Tropix.html?th=1). This copyrighted work was displayed in
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15 Number PA1-674-265, specifically located at [http://eskimotube.com/56976-Suzie-](http://eskimotube.com/56976-Suzie-Carina-Beauties-In-The-Tropix.html?th=1)
16 [Carina-Beauties-In-The-Tropix.html?th=1](http://eskimotube.com/56976-Suzie-Carina-Beauties-In-The-Tropix.html?th=1). This copyrighted work was displayed in
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24 [S-And-Thalia-Beauties-In-The-Tropix.html?th=1](http://eskimotube.com/57079-Jennifer-S-And-Thalia-Beauties-In-The-Tropix.html?th=1). This copyrighted work was
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6 [Anderson-Beauties-In-The-Tropix.html?th=1](http://eskimotube.com/57045-Kathy-Anderson-Beauties-In-The-Tropix.html?th=1). This copyrighted work was displayed
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13 Number PA1-674-265, specifically located at [http://eskimotube.com/118382-Suzie-](http://eskimotube.com/118382-Suzie-Carina-Beauties-In-The-Tropix---Scene-2.html?th=1)
14 [Carina-Beauties-In-The-Tropix---Scene-2.html?th=1](http://eskimotube.com/118382-Suzie-Carina-Beauties-In-The-Tropix---Scene-2.html?th=1). This copyrighted work was
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4 [Lion-Caribbean-Dream.html?th=1](http://eskimotube.com/90557-Laura-Lion-Caribbean-Dream.html?th=1). This copyrighted work was displayed in this
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19 Number PA1-670-898, specifically located at [http://eskimotube.com/90037-Nikki-](http://eskimotube.com/90037-Nikki-Rider-Caribbean-Dream.html?th=1)
20 [Rider-Caribbean-Dream.html?th=1](http://eskimotube.com/90037-Nikki-Rider-Caribbean-Dream.html?th=1). This copyrighted work was displayed in this
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1 Number PA1-670-898, specifically located at [http://eskimotube.com/90244-Katia-](http://eskimotube.com/90244-Katia-And-Veronica-Da-Souza-Caribbean-Dream.html?th=1)
2 [And-Veronica-Da-Souza-Caribbean-Dream.html?th=1](http://eskimotube.com/90244-Katia-And-Veronica-Da-Souza-Caribbean-Dream.html?th=1). This copyrighted work was
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15 [Dominatrix-Chess-Gambit.html?th=1](http://eskimotube.com/79578-Melinda-Vecsey-And-Michelle-Wild-And-Orsi-Shine-Dominatrix-Chess-Gambit.html?th=1). This copyrighted work was displayed in this
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7 [Dominatrix-Chess-Gambit.html?th=1](http://eskimotube.com/79517-Dora-Venter-And-Jessica-Mark-And-Michelle-Wild-Dominatrix-Chess-Gambit.html?th=1). This copyrighted work was displayed in this
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4 [Rita-Faltoyano-And-Tina-T-Gladiator.html?th=1](http://eskimotube.com/59494-Dorothy-Black-And-Rita-Faltoyano-And-Tina-T-Gladiator.html?th=1). This copyrighted work was
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10 [Bright-And-Silvia-Sexton-Guns-And-Rough-Sex.html?th=1](http://eskimotube.com/75269-Mandy-Bright-And-Silvia-Sexton-Guns-And-Rough-Sex.html?th=1). This copyrighted work
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18 [Rouso-And-Leslie-Taylor-And-Michelle-Wild-Guns-And-Rough-Sex.html?th=1](http://eskimotube.com/74558-Adriana-Rouso-And-Leslie-Taylor-And-Michelle-Wild-Guns-And-Rough-Sex.html?th=1).
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26 [Dolce-And-Silvia-Sexton-Guns-And-Rough-Sex.html?th=1](http://eskimotube.com/74355-Bambie-Dolce-And-Silvia-Sexton-Guns-And-Rough-Sex.html?th=1). This copyrighted work

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14 Christin-Black-And-Tia-Lady-Of-The-Rings---Scene-1.html?th=1](http://eskimotube.com/118526-Christin-Black-And-Tia-Lady-Of-The-Rings---Scene-1.html?th=1). This copyrighted
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23 5.html?th=1](http://eskimotube.com/118731-Gina-Blonde-And-Silvia-Saint-And-Simony-Diamond-Lady-Of-The-Rings---Scene-5.html?th=1). This copyrighted work was displayed in this manner without the
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6 [Lilliane-Tiger-And-Valentina-Velasques-Lady-Of-The-Rings---Scene-4.html?th=1](http://eskimotube.com/118423-Lilliane-Tiger-And-Valentina-Velasques-Lady-Of-The-Rings---Scene-4.html?th=1).
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14 [Conde-And-Miercole-The-Fetish-Garden.html?th=1](http://eskimotube.com/77574-Bibian-Norai-And-Christina-Bella-And-Malena-Conde-And-Miercole-The-Fetish-Garden.html?th=1) This copyrighted work was
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25 Agreement specifically prohibited MetaInterface's display in this manner or
26 MetaInterfaces permission and/or authorization for such display.

1 232. In May 2010, www.eskimotube.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
3 PA1-670-904, specifically located at [http://eskimotube.com/67637-Janet-Alfano-
4 And-Justine-Ashley-Psychoporn.html?th=1](http://eskimotube.com/67637-Janet-Alfano-And-Justine-Ashley-Psychoporn.html?th=1). This copyrighted work was displayed in
5 this manner without the consent of, or licensing by, Fraserside, the copyright owner
6 and registrant of the motion picture. The Content Licensing Agreement specifically
7 prohibited MetaInterface's display in this manner or MetaInterfaces permission
8 and/or authorization for such display.

9 233. In May 2010, www.eskimotube.com displayed and offered for viewing
10 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
11 PA1-670-904, specifically located at [http://eskimotube.com/67848-Melissa-Black-
12 Psychoporn.html?th=1](http://eskimotube.com/67848-Melissa-Black-Psychoporn.html?th=1). This copyrighted work was displayed in this manner without
13 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the
14 motion picture. The Content Licensing Agreement specifically prohibited
15 MetaInterface's display in this manner or MetaInterfaces permission and/or
16 authorization for such display.

17 234. In May 2010, www.eskimotube.com displayed and offered for viewing
18 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
19 PA1-670-904, specifically located at [http://eskimotube.com/67848-Melissa-Black-
20 Psychoporn.html?th=1](http://eskimotube.com/67848-Melissa-Black-Psychoporn.html?th=1), in a manner which permitted and/or allowed the user to copy
21 the embedded code of the Plaintiff film and thereafter display the film in any manner
22 or location desired by the user. This copyrighted work was displayed in this manner
23 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
24 of the motion picture. The Content Licensing Agreement specifically prohibited
25 MetaInterface's display in this manner or MetaInterfaces permission and/or
26 authorization for such display.

1 235. In May 2010, www.eskimotube.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
3 PA1-670-904, specifically located at [http://eskimotube.com/67879-Liliane-Tiger-](http://eskimotube.com/67879-Liliane-Tiger-Psychoporn.html?th=1)
4 [Psychoporn.html?th=1](http://eskimotube.com/67879-Liliane-Tiger-Psychoporn.html?th=1). This copyrighted work was displayed in this manner without
5 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the
6 motion picture. The Content Licensing Agreement specifically prohibited
7 MetaInterface's display in this manner or MetaInterfaces permission and/or
8 authorization for such display.

9 236. In May 2010, www.eskimotube.com displayed and offered for viewing
10 Fraserside's copyrighted work titled Sex, Lies & Internet, Copyright Registration
11 Number PA1-673-407, specifically located at
12 <http://eskimotube.com/show.php?search=SEX,%20LIES%20&%20INTERNET>.
13 This copyrighted work was displayed in this manner without the consent of, or
14 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
15 The Content Licensing Agreement specifically prohibited MetaInterface's display in
16 this manner or MetaInterfaces permission and/or authorization for such display.

17 237. In May 2010, www.eskimotube.com displayed and offered for viewing
18 Fraserside's copyrighted work titled Sex, Lies & Internet, Copyright Registration
19 Number PA1-673-407, specifically located at [http://eskimotube.com/56758-Sandra-](http://eskimotube.com/56758-Sandra-Iron-Sex-Lies-And-Internet.html?th=1)
20 [Iron-Sex-Lies-And-Internet.html?th=1](http://eskimotube.com/56758-Sandra-Iron-Sex-Lies-And-Internet.html?th=1). This copyrighted work was displayed in this
21 manner without the consent of, or licensing by, Fraserside, the copyright owner and
22 registrant of the motion picture. The Content Licensing Agreement specifically
23 prohibited MetaInterface's display in this manner or MetaInterfaces permission
24 and/or authorization for such display.

25 238. In May 2010, www.eskimotube.com displayed and offered for viewing
26 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number

1 PA1-672-445, specifically located at
2 <http://eskimotube.com/show.php?search=sexy%20business>. This copyrighted work
3 was displayed in this manner without the consent of, or licensing by, Fraserside, the
4 copyright owner and registrant of the motion picture. The Content Licensing
5 Agreement specifically prohibited MetaInterface's display in this manner or
6 MetaInterfaces permission and/or authorization for such display.

7 239. In May 2010, www.eskimotube.com displayed and offered for viewing
8 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
9 PA1-672-445, specifically located at [http://eskimotube.com/89438-Poppy-Morgan-](http://eskimotube.com/89438-Poppy-Morgan-Sexy-Business.html?th=1)
10 [Sexy-Business.html?th=1](http://eskimotube.com/89438-Poppy-Morgan-Sexy-Business.html?th=1). This copyrighted work was displayed in this manner
11 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
12 of the motion picture. The Content Licensing Agreement specifically prohibited
13 MetaInterface's display in this manner or MetaInterfaces permission and/or
14 authorization for such display.

15 240. In May 2010, www.eskimotube.com displayed and offered for viewing
16 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
17 PA1-670-902, specifically located at
18 <http://eskimotube.com/show.php?search=spread%20my%20lips>. This copyrighted
19 work was displayed in this manner without the consent of, or licensing by, Fraserside,
20 the copyright owner and registrant of the motion picture. The Content Licensing
21 Agreement specifically prohibited MetaInterface's display in this manner or
22 MetaInterfaces permission and/or authorization for such display.

23 241. In May 2010, www.eskimotube.com displayed and offered for viewing
24 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
25 PA1-670-902, specifically located at [http://eskimotube.com/54613-Electra-Angel-](http://eskimotube.com/54613-Electra-Angel-And-Katy-Caro-Spread-My-Lips.html?th=1)
26 [And-Katy-Caro-Spread-My-Lips.html?th=1](http://eskimotube.com/54613-Electra-Angel-And-Katy-Caro-Spread-My-Lips.html?th=1). This copyrighted work was displayed in

1 this manner without the consent of, or licensing by, Fraserside, the copyright owner
2 and registrant of the motion picture. The Content Licensing Agreement specifically
3 prohibited MetaInterface's display in this manner or MetaInterfaces permission
4 and/or authorization for such display.

5 242. In May 2010, www.eskimotube.com displayed and offered for viewing
6 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
7 PA1-670-902, specifically located at [http://eskimotube.com/54740-Rebecca-Linares-](http://eskimotube.com/54740-Rebecca-Linares-Spread-My-Lips.html?th=1)
8 [Spread-My-Lips.html?th=1](http://eskimotube.com/54740-Rebecca-Linares-Spread-My-Lips.html?th=1). This copyrighted work was displayed in this manner
9 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
10 of the motion picture. The Content Licensing Agreement specifically prohibited
11 MetaInterface's display in this manner or MetaInterfaces permission and/or
12 authorization for such display.

13 243. In May 2010, www.eskimotube.com displayed and offered for viewing
14 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
15 670-897, specifically located at <http://eskimotube.com/show.php?search=tenerife>.
16 This copyrighted work was displayed in this manner without the consent of, or
17 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
18 The Content Licensing Agreement specifically prohibited MetaInterface's display in
19 this manner or MetaInterfaces permission and/or authorization for such display.

20 244. In May 2010, www.eskimotube.com displayed and offered for viewing
21 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
22 670-897, specifically located at [http://eskimotube.com/89516-Jane-Darling-And-](http://eskimotube.com/89516-Jane-Darling-And-Silvia-Saint-Tenerife.html?th=1)
23 [Silvia-Saint-Tenerife.html?th=1](http://eskimotube.com/89516-Jane-Darling-And-Silvia-Saint-Tenerife.html?th=1). This copyrighted work was displayed in this
24 manner without the consent of, or licensing by, Fraserside, the copyright owner and
25 registrant of the motion picture. The Content Licensing Agreement specifically
26

1 prohibited MetaInterface's display in this manner or MetaInterfaces permission
2 and/or authorization for such display.

3 245. In May 2010, www.eskimotube.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
5 PA1-670-893, specifically located at
6 <http://eskimotube.com/show.php?search=tropical%20twins>. This copyrighted work
7 was displayed in this manner without the consent of, or licensing by, Fraserside, the
8 copyright owner and registrant of the motion picture. The Content Licensing
9 Agreement specifically prohibited MetaInterface's display in this manner or
10 MetaInterfaces permission and/or authorization for such display.

11 246. In May 2010, www.eskimotube.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
13 PA1-670-893, specifically located at [http://eskimotube.com/89669-Sharka-Blue-And-](http://eskimotube.com/89669-Sharka-Blue-And-Liliane-Tiger-Tropical-Twins.html?th=1)
14 [Liliane-Tiger-Tropical-Twins.html?th=1](http://eskimotube.com/89669-Sharka-Blue-And-Liliane-Tiger-Tropical-Twins.html?th=1). This copyrighted work was displayed in
15 this manner without the consent of, or licensing by, Fraserside, the copyright owner
16 and registrant of the motion picture. The Content Licensing Agreement specifically
17 prohibited MetaInterface's display in this manner or MetaInterfaces permission
18 and/or authorization for such display.

19 247. In May 2010, www.eskimotube.com displayed and offered for viewing
20 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
21 Number PA1-670-895, specifically located at
22 <http://eskimotube.com/show.php?search=the%20girls%20of%20desire>. This
23 copyrighted work was displayed in this manner without the consent of, or licensing
24 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
25 Licensing Agreement specifically prohibited MetaInterface's display in this manner
26 or MetaInterfaces permission and/or authorization for such display.

1 248. In May 2010, [www.eskimotube.com](http://www.eskimotube.com/61909-Sophie-Moone-The-Girls-Of-Desire.html?th=1) displayed and offered for viewing
2 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
3 Number PA1-670-895, specifically located at [http://eskimotube.com/61909-Sophie-](http://eskimotube.com/61909-Sophie-Moone-The-Girls-Of-Desire.html?th=1)
4 [Moone-The-Girls-Of-Desire.html?th=1](http://eskimotube.com/61909-Sophie-Moone-The-Girls-Of-Desire.html?th=1). This copyrighted work was displayed in this
5 manner without the consent of, or licensing by, Fraserside, the copyright owner and
6 registrant of the motion picture. The Content Licensing Agreement specifically
7 prohibited MetaInterface's display in this manner or MetaInterfaces permission
8 and/or authorization for such display.

9 249. In May 2010, [www.eskimotube.com](http://www.eskimotube.com/62139-Lucy-Lee-The-Girls-Of-Desire.html?th=1) displayed and offered for viewing
10 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
11 Number PA1-670-895, specifically located at [http://eskimotube.com/62139-Lucy-](http://eskimotube.com/62139-Lucy-Lee-The-Girls-Of-Desire.html?th=1)
12 [Lee-The-Girls-Of-Desire.html?th=1](http://eskimotube.com/62139-Lucy-Lee-The-Girls-Of-Desire.html?th=1). This copyrighted work was displayed in this
13 manner without the consent of, or licensing by, Fraserside, the copyright owner and
14 registrant of the motion picture. The Content Licensing Agreement specifically
15 prohibited MetaInterface's display in this manner or MetaInterfaces permission
16 and/or authorization for such display.

17 250. In May 2010, [www.eskimotube.com](http://www.eskimotube.com/61749-Alexa-Weix-And-Bianca-And-Nikki-Black-The-Girls-Of-Desire.html?th=1) displayed and offered for viewing
18 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
19 Number PA1-670-895, specifically located at [http://eskimotube.com/61749-Alexa-](http://eskimotube.com/61749-Alexa-Weix-And-Bianca-And-Nikki-Black-The-Girls-Of-Desire.html?th=1)
20 [Weix-And-Bianca-And-Nikki-Black-The-Girls-Of-Desire.html?th=1](http://eskimotube.com/61749-Alexa-Weix-And-Bianca-And-Nikki-Black-The-Girls-Of-Desire.html?th=1). This
21 copyrighted work was displayed in this manner without the consent of, or licensing
22 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
23 Licensing Agreement specifically prohibited MetaInterface's display in this manner
24 or MetaInterfaces permission and/or authorization for such display.

25 251. In May 2010, www.eskimotube.com displayed and offered for viewing
26 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration

1 Number PA1-670-895, specifically located at [http://eskimotube.com/62228-Carmen-](http://eskimotube.com/62228-Carmen-White-And-Michelle-Wild-The-Girls-Of-Desire.html?th=1)
2 [White-And-Michelle-Wild-The-Girls-Of-Desire.html?th=1](http://eskimotube.com/62228-Carmen-White-And-Michelle-Wild-The-Girls-Of-Desire.html?th=1). This copyrighted work
3 was displayed in this manner without the consent of, or licensing by, Fraserside, the
4 copyright owner and registrant of the motion picture. The Content Licensing
5 Agreement specifically prohibited MetaInterface's display in this manner or
6 MetaInterfaces permission and/or authorization for such display.

7 252. In May 2010, on its Internet Web site page, specifically located at
8 [http://eskimotube.com/59494-Dorothy-Black-And-Rita-Faltoyano-And-Tina-T-](http://eskimotube.com/59494-Dorothy-Black-And-Rita-Faltoyano-And-Tina-T-Gladiator.html?th=1)
9 [Gladiator.html?th=1](http://eskimotube.com/59494-Dorothy-Black-And-Rita-Faltoyano-And-Tina-T-Gladiator.html?th=1), www.eskimotube.com displayed and/or utilized Plaintiff's
10 trademarks PRIVATE, Registration Number 1014957. Plaintiff's trademarks were
11 infringed in this manner as they were displayed without the consent of, or licensing
12 by, the Plaintiff, the trademark owner and registrant of the trademark.

13 **www.tjoob.com**

14 253. On the Internet web site located at www.tjoob.com, Plaintiff's videos are
15 displayed.

16 254. Defendants have incorporated a business model which uses infringing
17 content to attract a high volume of visitors to the site for the purpose of selling
18 advertising.

19 255. In the locations on www.tjoob.com where Plaintiff's copyrighted works
20 are displayed, advertisements for third party vendors are displayed. Plaintiff's videos
21 specifically benefit those third party advertisers.

22 256. Each Plaintiff video displayed on www.tjoob.com exceeds nine (9)
23 minutes in length.

24 257. Each Plaintiff video displayed on www.tjoob.com is surrounded by third
25 party advertising.

1 258. Under each Plaintiff video displayed on www.tjoob.com are icons
2 provided through a service operated by addthis.com; each icon provides a different
3 function for the end user. Icon functions include allowing a user to email the video to
4 a third party, bookmark the video page, share the video through their account on sites
5 such as Facebook, Amazon, Twitter and Digg. This functionality induces a user to
6 commit infringement by promoting the video to third parties in mass.

7 259. Each Plaintiff video displayed on www.tjoob.com is accompanied with a
8 specific statement that the video is provided “By: X-Movie,” and specific link to
9 www.xmovie.com, which is owned and controlled by MetaInterfaces.

10 260. In May 2010, www.tjoob.com displayed and offered for viewing
11 Fraserside’s copyrighted work titled Anal Mermaids 1, Copyright Registration
12 Number PA1-670-905, specifically located at
13 <http://www.tjoob.com/vids/68523/maya-gold-Anal-Mermaids.html>. This copyrighted
14 work was displayed in this manner without the consent of, or licensing by, Fraserside,
15 the copyright owner and registrant of the motion picture. The Content Licensing
16 Agreement specifically prohibited MetaInterface’s display in this manner or
17 MetaInterfaces permission and/or authorization for such display.

18 261. In May 2010, www.tjoob.com displayed and offered for viewing
19 Fraserside’s copyrighted work titled Anal Mermaids 1, Copyright Registration
20 Number PA1-670-905, specifically located at
21 <http://www.tjoob.com/vids/68523/maya-gold-Anal-Mermaids.html>, in a manner
22 which permitted and/or allowed the user to copy the embedded code of the Plaintiff
23 film and thereafter display the film in any manner or location desired by the user.
24 This copyrighted work was displayed in this manner without the consent of, or
25 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
26

1 The Content Licensing Agreement specifically prohibited MetaInterface's display in
2 this manner or MetaInterfaces permission and/or authorization for such display.

3 262. In May 2010, www.tjoob.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Anal Mermaids 1, Copyright Registration
5 Number PA1-670-905, specifically located at [http://www.tjoob.com/search/anal-](http://www.tjoob.com/search/anal-mermaids/)
6 [mermaids/](http://www.tjoob.com/search/anal-mermaids/). This copyrighted work was displayed in this manner without the consent
7 of, or licensing by, Fraserside, the copyright owner and registrant of the motion
8 picture. The Content Licensing Agreement specifically prohibited MetaInterface's
9 display in this manner or MetaInterfaces permission and/or authorization for such
10 display.

11 263. In May 2010, www.tjoob.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Anal Mermaids 1, Copyright Registration
13 Number PA1-670-905, specifically located at [http://www.tjoob.com/search/anal-](http://www.tjoob.com/search/anal-mermaids/)
14 [mermaids/](http://www.tjoob.com/search/anal-mermaids/), in a manner which permitted and/or allowed the user to copy the
15 embedded code of the Plaintiff film and thereafter display the film in any manner or
16 location desired by the user. This copyrighted work was displayed in this manner
17 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
18 of the motion picture. The Content Licensing Agreement specifically prohibited
19 MetaInterface's display in this manner or MetaInterfaces permission and/or
20 authorization for such display.

21 264. In May 2010, www.tjoob.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
23 PA1-674-266, specifically located at <http://www.tjoob.com/search/anal-freedom/>.
24 This copyrighted work was displayed in this manner without the consent of, or
25 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
26

1 The Content Licensing Agreement specifically prohibited MetaInterface's display in
2 this manner or MetaInterfaces permission and/or authorization for such display.

3 265. In May 2010, www.tjoob.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
5 PA1-674-266, specifically located at <http://www.tjoob.com/search/anal-freedom/>, in a
6 manner which permitted and/or allowed the user to copy the embedded code of the
7 Plaintiff film and thereafter display the film in any manner or location desired by the
8 user. This copyrighted work was displayed in this manner without the consent of, or
9 licensing by, Fraserside, the copyright owner and registrant of the motion picture.

10 The Content Licensing Agreement specifically prohibited MetaInterface's display in
11 this manner or MetaInterfaces permission and/or authorization for such display.

12 266. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
14 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54665/kat-Anal-](http://www.tjoob.com/vids/54665/kat-Anal-Freedom.html)
15 [Freedom.html](http://www.tjoob.com/vids/54665/kat-Anal-Freedom.html). This copyrighted work was displayed in this manner without the
16 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
17 motion picture. The Content Licensing Agreement specifically prohibited
18 MetaInterface's display in this manner or MetaInterfaces permission and/or
19 authorization for such display.

20 267. In May 2010, www.tjoob.com displayed and offered for viewing
21 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
22 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54665/kat-Anal-](http://www.tjoob.com/vids/54665/kat-Anal-Freedom.html)
23 [Freedom.html](http://www.tjoob.com/vids/54665/kat-Anal-Freedom.html), in a manner which permitted and/or allowed the user to copy the
24 embedded code of the Plaintiff film and thereafter display the film in any manner or
25 location desired by the user. This copyrighted work was displayed in this manner
26 without the consent of, or licensing by, Fraserside, the copyright owner and registrant

1 of the motion picture. The Content Licensing Agreement specifically prohibited
2 MetaInterface's display in this manner or MetaInterfaces permission and/or
3 authorization for such display.

4 268. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
6 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54657/vanilla-skye-](http://www.tjoob.com/vids/54657/vanilla-skye-Anal-Freedom.html)
7 [Anal-Freedom.html](http://www.tjoob.com/vids/54657/vanilla-skye-Anal-Freedom.html). This copyrighted work was displayed in this manner without the
8 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
9 motion picture. The Content Licensing Agreement specifically prohibited
10 MetaInterface's display in this manner or MetaInterfaces permission and/or
11 authorization for such display.

12 269. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
14 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54657/vanilla-skye-](http://www.tjoob.com/vids/54657/vanilla-skye-Anal-Freedom.html)
15 [Anal-Freedom.html](http://www.tjoob.com/vids/54657/vanilla-skye-Anal-Freedom.html), in a manner which permitted and/or allowed the user to copy the
16 embedded code of the Plaintiff film and thereafter display the film in any manner or
17 location desired by the user. This copyrighted work was displayed in this manner
18 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
19 of the motion picture. The Content Licensing Agreement specifically prohibited
20 MetaInterface's display in this manner or MetaInterfaces permission and/or
21 authorization for such display.

22 270. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
24 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54742/sadie-jane-](http://www.tjoob.com/vids/54742/sadie-jane-and-naudia-rio-Anal-Freedom.html)
25 [and-naudia-rio-Anal-Freedom.html](http://www.tjoob.com/vids/54742/sadie-jane-and-naudia-rio-Anal-Freedom.html). This copyrighted work was displayed in this
26 manner without the consent of, or licensing by, Fraserside, the copyright owner and

1 registrant of the motion picture. The Content Licensing Agreement specifically
2 prohibited MetaInterface's display in this manner or MetaInterfaces permission
3 and/or authorization for such display.

4 271. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
6 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54742/sadie-jane-](http://www.tjoob.com/vids/54742/sadie-jane-and-naudia-río-Anal-Freedom.html)
7 [and-naudia-río-Anal-Freedom.html](http://www.tjoob.com/vids/54742/sadie-jane-and-naudia-río-Anal-Freedom.html), in a manner which permitted and/or allowed the
8 user to copy the embedded code of the Plaintiff film and thereafter display the film in
9 any manner or location desired by the user. This copyrighted work was displayed in
10 this manner without the consent of, or licensing by, Fraserside, the copyright owner
11 and registrant of the motion picture. The Content Licensing Agreement specifically
12 prohibited MetaInterface's display in this manner or MetaInterfaces permission
13 and/or authorization for such display.

14 272. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
16 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54637/melissa-](http://www.tjoob.com/vids/54637/melissa-lauren-Anal-Freedom.html)
17 [lauren-Anal-Freedom.html](http://www.tjoob.com/vids/54637/melissa-lauren-Anal-Freedom.html). This copyrighted work was displayed in this manner
18 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
19 of the motion picture. The Content Licensing Agreement specifically prohibited
20 MetaInterface's display in this manner or MetaInterfaces permission and/or
21 authorization for such display.

22 273. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Anal Freedom 1, Copyright Registration Number
24 PA1-674-266, specifically located at [http://www.tjoob.com/vids/54637/melissa-](http://www.tjoob.com/vids/54637/melissa-lauren-Anal-Freedom.html)
25 [lauren-Anal-Freedom.html](http://www.tjoob.com/vids/54637/melissa-lauren-Anal-Freedom.html), in a manner which permitted and/or allowed the user to
26 copy the embedded code of the Plaintiff film and thereafter display the film in any

1 manner or location desired by the user. This copyrighted work was displayed in this
2 manner without the consent of, or licensing by, Fraserside, the copyright owner and
3 registrant of the motion picture. The Content Licensing Agreement specifically
4 prohibited MetaInterface's display in this manner or MetaInterfaces permission
5 and/or authorization for such display.

6 274. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled Beauties In the Tropix 1, Copyright Registration
8 Number PA1-674-265, specifically located at
9 <http://www.tjoob.com/vids/56976/suzie-carina-Beauties-In-The-Tropix.html>. This
10 copyrighted work was displayed in this manner without the consent of, or licensing
11 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
12 Licensing Agreement specifically prohibited MetaInterface's display in this manner
13 or MetaInterfaces permission and/or authorization for such display.

14 275. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled Beauties In the Tropix 1, Copyright Registration
16 Number PA1-674-265, specifically located at
17 <http://www.tjoob.com/vids/56976/suzie-carina-Beauties-In-The-Tropix.html>, in a
18 manner which permitted and/or allowed the user to copy the embedded code of the
19 Plaintiff film and thereafter display the film in any manner or location desired by the
20 user. This copyrighted work was displayed in this manner without the consent of, or
21 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
22 The Content Licensing Agreement specifically prohibited MetaInterface's display in
23 this manner or MetaInterfaces permission and/or authorization for such display.

24 276. In May 2010, www.tjoob.com displayed and offered for viewing
25 Fraserside's copyrighted work titled Coming of Age 1, Copyright Registration
26 Number PA1-674-262, specifically located at

1 <http://www.tjoob.com/vids/68712/unknown-Coming-Of-Age.html>. This copyrighted
2 work was displayed in this manner without the consent of, or licensing by, Fraserside,
3 the copyright owner and registrant of the motion picture. The Content Licensing
4 Agreement specifically prohibited MetaInterface's display in this manner or
5 MetaInterfaces permission and/or authorization for such display.

6 277. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled Coming of Age 1, Copyright Registration
8 Number PA1-674-262, specifically located at
9 <http://www.tjoob.com/vids/68712/unknown-Coming-Of-Age.html>, in a manner
10 which permitted and/or allowed the user to copy the embedded code of the Plaintiff
11 film and thereafter display the film in any manner or location desired by the user.
12 This copyrighted work was displayed in this manner without the consent of, or
13 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
14 The Content Licensing Agreement specifically prohibited MetaInterface's display in
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16 278. In May 2010, www.tjoob.com displayed and offered for viewing
17 Fraserside's copyrighted work titled Coming of Age 1, Copyright Registration
18 Number PA1-674-262, specifically located at
19 <http://www.tjoob.com/vids/68712/unknown-Coming-Of-Age.html>. This copyrighted
20 work was displayed in this manner without the consent of, or licensing by, Fraserside,
21 the copyright owner and registrant of the motion picture. The Content Licensing
22 Agreement specifically prohibited MetaInterface's display in this manner or
23 MetaInterfaces permission and/or authorization for such display.

24 279. In May 2010, www.tjoob.com displayed and offered for viewing
25 Fraserside's copyrighted work titled Coming of Age 1, Copyright Registration
26 Number PA1-674-262, specifically located at

1 <http://www.tjoob.com/vids/68712/unknown-Coming-Of-Age.html>, in a manner
2 which permitted and/or allowed the user to copy the embedded code of the Plaintiff
3 film and thereafter display the film in any manner or location desired by the user.
4 This copyrighted work was displayed in this manner without the consent of, or
5 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
6 The Content Licensing Agreement specifically prohibited MetaInterface's display in
7 this manner or MetaInterfaces permission and/or authorization for such display.

8 280. In May 2010, www.tjoob.com displayed and offered for viewing
9 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
10 Number PA1-675-596, specifically located at
11 <http://www.tjoob.com/search/dangerous-curves/playtime-0/>. This copyrighted work
12 was displayed in this manner without the consent of, or licensing by, Fraserside, the
13 copyright owner and registrant of the motion picture. The Content Licensing
14 Agreement specifically prohibited MetaInterface's display in this manner or
15 MetaInterfaces permission and/or authorization for such display.

16 281. In May 2010, www.tjoob.com displayed and offered for viewing
17 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
18 Number PA1-675-596, specifically located at
19 <http://www.tjoob.com/search/dangerous-curves/playtime-0/>, in a manner which
20 permitted and/or allowed the user to copy the embedded code of the Plaintiff film and
21 thereafter display the film in any manner or location desired by the user. This
22 copyrighted work was displayed in this manner without the consent of, or licensing
23 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
24 Licensing Agreement specifically prohibited MetaInterface's display in this manner
25 or MetaInterfaces permission and/or authorization for such display.

1 282. In May 2010, www.tjoob.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
3 Number PA1-675-596, specifically located at
4 <http://www.tjoob.com/vids/77606/cecile-Dangerous-Curves.html>. This copyrighted
5 work was displayed in this manner without the consent of, or licensing by, Fraserside,
6 the copyright owner and registrant of the motion picture. The Content Licensing
7 Agreement specifically prohibited MetaInterface's display in this manner or
8 MetaInterfaces permission and/or authorization for such display.

9 283. In May 2010, www.tjoob.com displayed and offered for viewing
10 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
11 Number PA1-675-596, specifically located at
12 <http://www.tjoob.com/vids/77606/cecile-Dangerous-Curves.html>, in a manner which
13 permitted and/or allowed the user to copy the embedded code of the Plaintiff film and
14 thereafter display the film in any manner or location desired by the user. This
15 copyrighted work was displayed in this manner without the consent of, or licensing
16 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
17 Licensing Agreement specifically prohibited MetaInterface's display in this manner
18 or MetaInterfaces permission and/or authorization for such display.

19 284. In May 2010, www.tjoob.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
21 Number PA1-675-596, specifically located at [http://www.tjoob.com/vids/77676/jane-](http://www.tjoob.com/vids/77676/jane-darling-Dangerous-Curves.html)
22 [darling-Dangerous-Curves.html](http://www.tjoob.com/vids/77676/jane-darling-Dangerous-Curves.html). This copyrighted work was displayed in this
23 manner without the consent of, or licensing by, Fraserside, the copyright owner and
24 registrant of the motion picture. The Content Licensing Agreement specifically
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1 285. In May 2010, www.tjoob.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Dangerous Curves, Copyright Registration
3 Number PA1-675-596, specifically located at [http://www.tjoob.com/vids/77676/jane-](http://www.tjoob.com/vids/77676/jane-darling-Dangerous-Curves.html)
4 [darling-Dangerous-Curves.html](http://www.tjoob.com/vids/77676/jane-darling-Dangerous-Curves.html), in a manner which permitted and/or allowed the user
5 to copy the embedded code of the Plaintiff film and thereafter display the film in any
6 manner or location desired by the user. This copyrighted work was displayed in this
7 manner without the consent of, or licensing by, Fraserside, the copyright owner and
8 registrant of the motion picture. The Content Licensing Agreement specifically
9 prohibited MetaInterface's display in this manner or MetaInterfaces permission
10 and/or authorization for such display.

11 286. In May 2010, www.tjoob.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Dominatrix Chess Gambit, Copyright
13 Registration Number PA1-670-899, specifically located at
14 <http://www.tjoob.com/search/dominatrix-chess-gambit/>. This copyrighted work was
15 displayed in this manner without the consent of, or licensing by, Fraserside, the
16 copyright owner and registrant of the motion picture. The Content Licensing
17 Agreement specifically prohibited MetaInterface's display in this manner or
18 MetaInterfaces permission and/or authorization for such display.

19 287. In May 2010, www.tjoob.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Dominatrix Chess Gambit, Copyright
21 Registration Number PA1-670-899, specifically located at
22 <http://www.tjoob.com/search/dominatrix-chess-gambit/>, in a manner which permitted
23 and/or allowed the user to copy the embedded code of the Plaintiff film and thereafter
24 display the film in any manner or location desired by the user. This copyrighted work
25 was displayed in this manner without the consent of, or licensing by, Fraserside, the
26 copyright owner and registrant of the motion picture. The Content Licensing

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3 288. In May 2010, www.tjoob.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Fatal Orchid 2, Copyright Registration Number
5 PA1-675-598, specifically located at [http://www.tjoob.com/search/fatal-](http://www.tjoob.com/search/fatal-orchid/playtime-0/)
6 [orchid/playtime-0/](http://www.tjoob.com/search/fatal-orchid/playtime-0/). This copyrighted work was displayed in this manner without the
7 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
8 motion picture. The Content Licensing Agreement specifically prohibited
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11 289. In May 2010, www.tjoob.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Fatal Orchid 2, Copyright Registration Number
13 PA1-675-598, specifically located at [http://www.tjoob.com/search/fatal-](http://www.tjoob.com/search/fatal-orchid/playtime-0/)
14 [orchid/playtime-0/](http://www.tjoob.com/search/fatal-orchid/playtime-0/), in a manner which permitted and/or allowed the user to copy the
15 embedded code of the Plaintiff film and thereafter display the film in any manner or
16 location desired by the user. This copyrighted work was displayed in this manner
17 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
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20 authorization for such display.

21 290. In May 2010, www.tjoob.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Fatal Orchid 2, Copyright Registration Number
23 PA1-675-598, specifically located at [http://www.tjoob.com/vids/78146/swanny-](http://www.tjoob.com/vids/78146/swanny-Fatal-Orchid--2.html)
24 [Fatal-Orchid--2.html](http://www.tjoob.com/vids/78146/swanny-Fatal-Orchid--2.html). This copyrighted work was displayed in this manner without
25 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the
26 motion picture. The Content Licensing Agreement specifically prohibited

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3 291. In May 2010, www.tjoob.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Fatal Orchid 2, Copyright Registration Number
5 PA1-675-598, specifically located at [http://www.tjoob.com/vids/78146/swanny-](http://www.tjoob.com/vids/78146/swanny-Fatal-Orchid--2.html)
6 [Fatal-Orchid--2.html](http://www.tjoob.com/vids/78146/swanny-Fatal-Orchid--2.html), in a manner which permitted and/or allowed the user to copy
7 the embedded code of the Plaintiff film and thereafter display the film in any manner
8 or location desired by the user. This copyrighted work was displayed in this manner
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12 authorization for such display.

13 292. In May 2010, www.tjoob.com displayed and offered for viewing
14 Fraserside's copyrighted work titled Fatal Orchid 2, Copyright Registration Number
15 PA1-675-598, specifically located at [http://www.tjoob.com/vids/77677/jasmine-](http://www.tjoob.com/vids/77677/jasmine-Fatal-Orchid--2.html)
16 [Fatal-Orchid--2.html](http://www.tjoob.com/vids/77677/jasmine-Fatal-Orchid--2.html). This copyrighted work was displayed in this manner without
17 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the
18 motion picture. The Content Licensing Agreement specifically prohibited
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21 293. In May 2010, www.tjoob.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Fatal Orchid 2, Copyright Registration Number
23 PA1-675-598, specifically located at [http://www.tjoob.com/vids/77677/jasmine-](http://www.tjoob.com/vids/77677/jasmine-Fatal-Orchid--2.html)
24 [Fatal-Orchid--2.html](http://www.tjoob.com/vids/77677/jasmine-Fatal-Orchid--2.html), in a manner which permitted and/or allowed the user to copy
25 the embedded code of the Plaintiff film and thereafter display the film in any manner
26 or location desired by the user. This copyrighted work was displayed in this manner

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4 authorization for such display.

5 294. In May 2010, www.tjoob.com displayed and offered for viewing
6 Fraserside's copyrighted work titled Fetish Machine - The Fetish Garden #12,
7 Copyright Registration Number PA1674498, specifically located at
8 <http://www.tjoob.com/search/The-Fetish-Garden/>. This copyrighted work was
9 displayed in this manner without the consent of, or licensing by, Fraserside, the
10 copyright owner and registrant of the motion picture. The Content Licensing
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13 295. In May 2010, www.tjoob.com displayed and offered for viewing
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16 <http://www.tjoob.com/search/The-Fetish-Garden/>, in a manner which permitted
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23 296. In May 2010, www.tjoob.com displayed and offered for viewing
24 Fraserside's copyrighted work titled Fetish Machine - The Fetish Garden #12,
25 Copyright Registration Number PA1674498, specifically located at
26 <http://www.tjoob.com/vids/77574/bibian-norai-and-christina-bella-and-malena->

1 conde-and-miercole-The-Fetish-Garden.html. This copyrighted work was displayed
2 in this manner without the consent of, or licensing by, Fraserside, the copyright
3 owner and registrant of the motion picture. The Content Licensing Agreement
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6 297. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled Fetish Machine - The Fetish Garden #12,
8 Copyright Registration Number PA1674498, specifically located at
9 [http://www.tjoob.com/vids/77574/bibian-norai-and-christina-bella-and-malena-](http://www.tjoob.com/vids/77574/bibian-norai-and-christina-bella-and-malena-conde-and-miercole-The-Fetish-Garden.html)
10 [conde-and-miercole-The-Fetish-Garden.html](http://www.tjoob.com/vids/77574/bibian-norai-and-christina-bella-and-malena-conde-and-miercole-The-Fetish-Garden.html), in a manner which permitted and/or
11 allowed the user to copy the embedded code of the Plaintiff film and thereafter
12 display the film in any manner or location desired by the user. This copyrighted work
13 was displayed in this manner without the consent of, or licensing by, Fraserside, the
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15 Agreement specifically prohibited MetaInterface's display in this manner or
16 MetaInterfaces permission and/or authorization for such display.

17 298. In May 2010, www.tjoob.com displayed and offered for viewing
18 Fraserside's copyrighted work titled Fetish Machine - The Fetish Garden #12,
19 Copyright Registration Number PA1674498, specifically located at
20 [http://www.tjoob.com/vids/78060/claudia-claire-and-christina-bella-The-Fetish-](http://www.tjoob.com/vids/78060/claudia-claire-and-christina-bella-The-Fetish-Garden.html)
21 [Garden.html](http://www.tjoob.com/vids/78060/claudia-claire-and-christina-bella-The-Fetish-Garden.html). This copyrighted work was displayed in this manner without the
22 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
23 motion picture. The Content Licensing Agreement specifically prohibited
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26

1 299. In May 2010, www.tjoob.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Fetish Machine - The Fetish Garden #12,
3 Copyright Registration Number PA1674498, specifically located at
4 [http://www.tjoob.com/vids/78060/claudia-claire-and-christina-bella-The-Fetish-](http://www.tjoob.com/vids/78060/claudia-claire-and-christina-bella-The-Fetish-Garden.html)
5 [Garden.html](http://www.tjoob.com/vids/78060/claudia-claire-and-christina-bella-The-Fetish-Garden.html), in a manner which permitted and/or allowed the user to copy the
6 embedded code of the Plaintiff film and thereafter display the film in any manner or
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10 MetaInterface's display in this manner or MetaInterfaces permission and/or
11 authorization for such display.

12 300. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled Fetish Machine - The Fetish Garden #12,
14 Copyright Registration Number PA1674498, specifically located at
15 <http://www.tjoob.com/vids/77888/stacy-silver-The-Fetish-Garden.html>. This
16 copyrighted work was displayed in this manner without the consent of, or licensing
17 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
18 Licensing Agreement specifically prohibited MetaInterface's display in this manner
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20 301. In May 2010, www.tjoob.com displayed and offered for viewing
21 Fraserside's copyrighted work titled Fetish Machine - The Fetish Garden #12,
22 Copyright Registration Number PA1674498, specifically located at
23 <http://www.tjoob.com/vids/77888/stacy-silver-The-Fetish-Garden.html>, in a manner
24 which permitted and/or allowed the user to copy the embedded code of the Plaintiff
25 film and thereafter display the film in any manner or location desired by the user.
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4 302. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
6 Number PA1-677-516, specifically located at
7 <http://www.tjoob.com/search/forbidden-games/playtime-0/>. This copyrighted work
8 was displayed in this manner without the consent of, or licensing by, Fraserside, the
9 copyright owner and registrant of the motion picture. The Content Licensing
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12 303. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
14 Number PA1-677-516, specifically located at
15 <http://www.tjoob.com/search/forbidden-games/playtime-0/>, in a manner which
16 permitted and/or allowed the user to copy the embedded code of the Plaintiff film and
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18 copyrighted work was displayed in this manner without the consent of, or licensing
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22 304. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
24 Number PA1-677-516, specifically located at [http://www.tjoob.com/vids/77919/dora-](http://www.tjoob.com/vids/77919/dora-venter-Forbidden-Games.html)
25 [venter-Forbidden-Games.html](http://www.tjoob.com/vids/77919/dora-venter-Forbidden-Games.html). This copyrighted work was displayed in this manner
26 without the consent of, or licensing by, Fraserside, the copyright owner and registrant

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4 305. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
6 Number PA1-677-516, specifically located at [http://www.tjoob.com/vids/77919/dora-](http://www.tjoob.com/vids/77919/dora-venter-Forbidden-Games.html)
7 [venter-Forbidden-Games.html](http://www.tjoob.com/vids/77919/dora-venter-Forbidden-Games.html), in a manner which permitted and/or allowed the user
8 to copy the embedded code of the Plaintiff film and thereafter display the film in any
9 manner or location desired by the user. This copyrighted work was displayed in this
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14 306. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
16 Number PA1-677-516, specifically located at
17 <http://www.tjoob.com/vids/78082/monica-sweetheart-Forbidden-Games.html>. This
18 copyrighted work was displayed in this manner without the consent of, or licensing
19 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
20 Licensing Agreement specifically prohibited MetaInterface's display in this manner
21 or MetaInterfaces permission and/or authorization for such display.

22 307. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Forbidden Games, Copyright Registration
24 Number PA1-677-516, specifically located at
25 <http://www.tjoob.com/vids/78082/monica-sweetheart-Forbidden-Games.html>, in a
26 manner which permitted and/or allowed the user to copy the embedded code of the

1 Plaintiff film and thereafter display the film in any manner or location desired by the
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4 The Content Licensing Agreement specifically prohibited MetaInterface's display in
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6 308. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
8 Number PA1-670-895, specifically located at [http://www.tjoob.com/search/the-girls-](http://www.tjoob.com/search/the-girls-of-desire/)
9 [of-desire/](http://www.tjoob.com/search/the-girls-of-desire/). This copyrighted work was displayed in this manner without the consent
10 of, or licensing by, Fraserside, the copyright owner and registrant of the motion
11 picture. The Content Licensing Agreement specifically prohibited MetaInterface's
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14 309. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
16 Number PA1-670-895, specifically located at [http://www.tjoob.com/search/the-girls-](http://www.tjoob.com/search/the-girls-of-desire/)
17 [of-desire/](http://www.tjoob.com/search/the-girls-of-desire/), in a manner which permitted and/or allowed the user to copy the
18 embedded code of the Plaintiff film and thereafter display the film in any manner or
19 location desired by the user. This copyrighted work was displayed in this manner
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24 310. In May 2010, www.tjoob.com displayed and offered for viewing
25 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
26 Number PA1-670-895, specifically located at

1 <http://www.tjoob.com/vids/61909/sophie-moone-The-Girls-Of-Desire.html>. This
2 copyrighted work was displayed in this manner without the consent of, or licensing
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6 311. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
8 Number PA1-670-895, specifically located at
9 <http://www.tjoob.com/vids/61909/sophie-moone-The-Girls-Of-Desire.html>, in a
10 manner which permitted and/or allowed the user to copy the embedded code of the
11 Plaintiff film and thereafter display the film in any manner or location desired by the
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16 312. In May 2010, www.tjoob.com displayed and offered for viewing
17 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
18 Number PA1-670-895, specifically located at
19 [http://www.tjoob.com/vids/61749/alexa-weix-and-bianca-and-nikki-black-The-Girls-](http://www.tjoob.com/vids/61749/alexa-weix-and-bianca-and-nikki-black-The-Girls-Of-Desire.html)
20 [Of-Desire.html](http://www.tjoob.com/vids/61749/alexa-weix-and-bianca-and-nikki-black-The-Girls-Of-Desire.html). This copyrighted work was displayed in this manner without the
21 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
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25 313. In May 2010, www.tjoob.com displayed and offered for viewing
26 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration

1 Number PA1-670-895, specifically located at
2 [http://www.tjoob.com/vids/61749/alexa-weix-and-bianca-and-nikki-black-The-Girls-](http://www.tjoob.com/vids/61749/alexa-weix-and-bianca-and-nikki-black-The-Girls-Of-Desire.html)
3 [Of-Desire.html](http://www.tjoob.com/vids/61749/alexa-weix-and-bianca-and-nikki-black-The-Girls-Of-Desire.html), in a manner which permitted and/or allowed the user to copy the
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9 authorization for such display.

10 314. In May 2010, www.tjoob.com displayed and offered for viewing
11 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
12 Number PA1-670-895, specifically located at
13 [http://www.tjoob.com/vids/62228/carmen-white-and-michelle-wild-The-Girls-Of-](http://www.tjoob.com/vids/62228/carmen-white-and-michelle-wild-The-Girls-Of-Desire.html)
14 [Desire.html](http://www.tjoob.com/vids/62228/carmen-white-and-michelle-wild-The-Girls-Of-Desire.html). This copyrighted work was displayed in this manner without the
15 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
16 motion picture. The Content Licensing Agreement specifically prohibited
17 MetaInterface's display in this manner or MetaInterfaces permission and/or
18 authorization for such display.

19 315. In May 2010, www.tjoob.com displayed and offered for viewing
20 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
21 Number PA1-670-895, specifically located at
22 [http://www.tjoob.com/vids/62228/carmen-white-and-michelle-wild-The-Girls-Of-](http://www.tjoob.com/vids/62228/carmen-white-and-michelle-wild-The-Girls-Of-Desire.html)
23 [Desire.html](http://www.tjoob.com/vids/62228/carmen-white-and-michelle-wild-The-Girls-Of-Desire.html), in a manner which permitted and/or allowed the user to copy the
24 embedded code of the Plaintiff film and thereafter display the film in any manner or
25 location desired by the user. This copyrighted work was displayed in this manner
26 without the consent of, or licensing by, Fraserside, the copyright owner and registrant

1 of the motion picture. The Content Licensing Agreement specifically prohibited
2 MetaInterface's display in this manner or MetaInterfaces permission and/or
3 authorization for such display.

4 316. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
6 Number PA1-670-895, specifically located at
7 <http://www.tjoob.com/vids/57515/fabiola-dos-santos-The-Girls-Of-Desire.html>. This
8 copyrighted work was displayed in this manner without the consent of, or licensing
9 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
10 Licensing Agreement specifically prohibited MetaInterface's display in this manner
11 or MetaInterfaces permission and/or authorization for such display.

12 317. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
14 Number PA1-670-895, specifically located at
15 <http://www.tjoob.com/vids/57515/fabiola-dos-santos-The-Girls-Of-Desire.html>, in a
16 manner which permitted and/or allowed the user to copy the embedded code of the
17 Plaintiff film and thereafter display the film in any manner or location desired by the
18 user. This copyrighted work was displayed in this manner without the consent of, or
19 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
20 The Content Licensing Agreement specifically prohibited MetaInterface's display in
21 this manner or MetaInterfaces permission and/or authorization for such display.

22 318. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
24 Number PA1-670-895, specifically located at [http://www.tjoob.com/vids/62139/lucy-](http://www.tjoob.com/vids/62139/lucy-lee-The-Girls-Of-Desire.html)
25 [lee-The-Girls-Of-Desire.html](http://www.tjoob.com/vids/62139/lucy-lee-The-Girls-Of-Desire.html). This copyrighted work was displayed in this manner
26 without the consent of, or licensing by, Fraserside, the copyright owner and registrant

1 of the motion picture. The Content Licensing Agreement specifically prohibited
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4 319. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled The Girls of Desire, Copyright Registration
6 Number PA1-670-895, specifically located at [http://www.tjoob.com/vids/62139/lucy-](http://www.tjoob.com/vids/62139/lucy-lee-The-Girls-Of-Desire.html)
7 [lee-The-Girls-Of-Desire.html](http://www.tjoob.com/vids/62139/lucy-lee-The-Girls-Of-Desire.html), in a manner which permitted and/or allowed the user to
8 copy the embedded code of the Plaintiff film and thereafter display the film in any
9 manner or location desired by the user. This copyrighted work was displayed in this
10 manner without the consent of, or licensing by, Fraserside, the copyright owner and
11 registrant of the motion picture. The Content Licensing Agreement specifically
12 prohibited MetaInterface's display in this manner or MetaInterfaces permission
13 and/or authorization for such display.

14 320. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled Gladiator, Copyright Registration Number PA1-
16 674-249, specifically located at <http://www.tjoob.com/search/GLADIATOR/>. This
17 copyrighted work was displayed in this manner without the consent of, or licensing
18 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
19 Licensing Agreement specifically prohibited MetaInterface's display in this manner
20 or MetaInterfaces permission and/or authorization for such display.

21 321. In May 2010, www.tjoob.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Gladiator, Copyright Registration Number PA1-
23 674-249, specifically located at <http://www.tjoob.com/search/GLADIATOR/>, in a
24 manner which permitted and/or allowed the user to copy the embedded code of the
25 Plaintiff film and thereafter display the film in any manner or location desired by the
26 user. This copyrighted work was displayed in this manner without the consent of, or

1 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
2 The Content Licensing Agreement specifically prohibited MetaInterface's display in
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4 322. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Gladiator, Copyright Registration Number PA1-
6 674-249, specifically located at [http://www.tjoob.com/vids/59494/dorothy-black-and-](http://www.tjoob.com/vids/59494/dorothy-black-and-rita-faltoyano-and-tina-t-Gladiator.html)
7 [rita-faltoyano-and-tina-t-Gladiator.html](http://www.tjoob.com/vids/59494/dorothy-black-and-rita-faltoyano-and-tina-t-Gladiator.html). This copyrighted work was displayed in this
8 manner without the consent of, or licensing by, Fraserside, the copyright owner and
9 registrant of the motion picture. The Content Licensing Agreement specifically
10 prohibited MetaInterface's display in this manner or MetaInterfaces permission
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12 323. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled Gladiator, Copyright Registration Number PA1-
14 674-249, specifically located at [http://www.tjoob.com/vids/59494/dorothy-black-and-](http://www.tjoob.com/vids/59494/dorothy-black-and-rita-faltoyano-and-tina-t-Gladiator.html)
15 [rita-faltoyano-and-tina-t-Gladiator.html](http://www.tjoob.com/vids/59494/dorothy-black-and-rita-faltoyano-and-tina-t-Gladiator.html), in a manner which permitted and/or allowed
16 the user to copy the embedded code of the Plaintiff film and thereafter display the
17 film in any manner or location desired by the user. This copyrighted work was
18 displayed in this manner without the consent of, or licensing by, Fraserside, the
19 copyright owner and registrant of the motion picture. The Content Licensing
20 Agreement specifically prohibited MetaInterface's display in this manner or
21 MetaInterfaces permission and/or authorization for such display.

22 324. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled House of Love, Copyright Registration Number
24 PA1-675-697, specifically located at [http://www.tjoob.com/search/house-of-](http://www.tjoob.com/search/house-of-love/playtime-0/)
25 [love/playtime-0/](http://www.tjoob.com/search/house-of-love/playtime-0/). This copyrighted work was displayed in this manner without the
26 consent of, or licensing by, Fraserside, the copyright owner and registrant of the

1 motion picture. The Content Licensing Agreement specifically prohibited
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4 325. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled House of Love, Copyright Registration Number
6 PA1-675-697, specifically located at [http://www.tjoob.com/search/house-of-](http://www.tjoob.com/search/house-of-love/playtime-0/)
7 [love/playtime-0/](http://www.tjoob.com/search/house-of-love/playtime-0/), in a manner which permitted and/or allowed the user to copy the
8 embedded code of the Plaintiff film and thereafter display the film in any manner or
9 location desired by the user. This copyrighted work was displayed in this manner
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13 authorization for such display.

14 326. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled House of Love, Copyright Registration Number
16 PA1-675-697, specifically located at [http://www.tjoob.com/vids/74272/victoria-](http://www.tjoob.com/vids/74272/victoria-House-Of-Love.html)
17 [House-Of-Love.html](http://www.tjoob.com/vids/74272/victoria-House-Of-Love.html). This copyrighted work was displayed in this manner without
18 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the
19 motion picture. The Content Licensing Agreement specifically prohibited
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21 authorization for such display.

22 327. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled House of Love, Copyright Registration Number
24 PA1-675-697, specifically located at [http://www.tjoob.com/vids/74272/victoria-](http://www.tjoob.com/vids/74272/victoria-House-Of-Love.html)
25 [House-Of-Love.html](http://www.tjoob.com/vids/74272/victoria-House-Of-Love.html), in a manner which permitted and/or allowed the user to copy
26 the embedded code of the Plaintiff film and thereafter display the film in any manner

1 or location desired by the user. This copyrighted work was displayed in this manner
2 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
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4 MetaInterface's display in this manner or MetaInterfaces permission and/or
5 authorization for such display.

6 328. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled House of Love, Copyright Registration Number
8 PA1-675-697, specifically located at [http://www.tjoob.com/vids/75565/inga-House-](http://www.tjoob.com/vids/75565/inga-House-Of-Love.html)
9 [Of-Love.html](http://www.tjoob.com/vids/75565/inga-House-Of-Love.html). This copyrighted work was displayed in this manner without the
10 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
11 motion picture. The Content Licensing Agreement specifically prohibited
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14 329. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled House of Love, Copyright Registration Number
16 PA1-675-697, specifically located at [http://www.tjoob.com/vids/75565/inga-House-](http://www.tjoob.com/vids/75565/inga-House-Of-Love.html)
17 [Of-Love.html](http://www.tjoob.com/vids/75565/inga-House-Of-Love.html), in a manner which permitted and/or allowed the user to copy the
18 embedded code of the Plaintiff film and thereafter display the film in any manner or
19 location desired by the user. This copyrighted work was displayed in this manner
20 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
21 of the motion picture. The Content Licensing Agreement specifically prohibited
22 MetaInterface's display in this manner or MetaInterfaces permission and/or
23 authorization for such display.

24 330. In May 2010, www.tjoob.com displayed and offered for viewing
25 Fraserside's copyrighted work titled Lady of the Rings, Copyright Registration
26 Number PA1-673-381, specifically located at <http://www.tjoob.com/search/Lady-Of->

1 the-Rings/. This copyrighted work was displayed in this manner without the consent
2 of, or licensing by, Fraserside, the copyright owner and registrant of the motion
3 picture. The Content Licensing Agreement specifically prohibited MetaInterface's
4 display in this manner or MetaInterfaces permission and/or authorization for such
5 display.

6 331. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled Lady of the Rings, Copyright Registration
8 Number PA1-673-381, specifically located at [http://www.tjoob.com/search/Lady-Of-](http://www.tjoob.com/search/Lady-Of-the-Rings/)
9 [the-Rings/](http://www.tjoob.com/search/Lady-Of-the-Rings/), in a manner which permitted and/or allowed the user to copy the
10 embedded code of the Plaintiff film and thereafter display the film in any manner or
11 location desired by the user. This copyrighted work was displayed in this manner
12 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
13 of the motion picture. The Content Licensing Agreement specifically prohibited
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15 authorization for such display.

16 332. In May 2010, www.tjoob.com displayed and offered for viewing
17 Fraserside's copyrighted work titled Lady of the Rings, Copyright Registration
18 Number PA1-673-381, specifically located at
19 [http://www.tjoob.com/vids/118423/lilliane-tiger-and-valentina-velasques-Lady-Of-](http://www.tjoob.com/vids/118423/lilliane-tiger-and-valentina-velasques-Lady-Of-The-Rings---Scene-4.html)
20 [The-Rings---Scene-4.html](http://www.tjoob.com/vids/118423/lilliane-tiger-and-valentina-velasques-Lady-Of-The-Rings---Scene-4.html). This copyrighted work was displayed in this manner
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25 333. In May 2010, www.tjoob.com displayed and offered for viewing
26 Fraserside's copyrighted work titled Lady of the Rings, Copyright Registration

1 Number PA1-673-381, specifically located at
2 [http://www.tjoob.com/vids/118423/lilliane-tiger-and-valentina-velasques-Lady-Of-](http://www.tjoob.com/vids/118423/lilliane-tiger-and-valentina-velasques-Lady-Of-The-Rings---Scene-4.html)
3 [The-Rings---Scene-4.html](http://www.tjoob.com/vids/118423/lilliane-tiger-and-valentina-velasques-Lady-Of-The-Rings---Scene-4.html), in a manner which permitted and/or allowed the user to
4 copy the embedded code of the Plaintiff film and thereafter display the film in any
5 manner or location desired by the user. This copyrighted work was displayed in this
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9 and/or authorization for such display.

10 334. In May 2010, www.tjoob.com displayed and offered for viewing
11 Fraserside's copyrighted work titled Lady of the Rings, Copyright Registration
12 Number PA1-673-381, specifically located at
13 [http://www.tjoob.com/vids/118526/christin-black-and-tia-Lady-Of-The-Rings---](http://www.tjoob.com/vids/118526/christin-black-and-tia-Lady-Of-The-Rings---Scene-1.html)
14 [Scene-1.html](http://www.tjoob.com/vids/118526/christin-black-and-tia-Lady-Of-The-Rings---Scene-1.html). This copyrighted work was displayed in this manner without the
15 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
16 motion picture. The Content Licensing Agreement specifically prohibited
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19 335. In May 2010, www.tjoob.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Lady of the Rings, Copyright Registration
21 Number PA1-673-381, specifically located at
22 [http://www.tjoob.com/vids/118526/christin-black-and-tia-Lady-Of-The-Rings---](http://www.tjoob.com/vids/118526/christin-black-and-tia-Lady-Of-The-Rings---Scene-1.html)
23 [Scene-1.html](http://www.tjoob.com/vids/118526/christin-black-and-tia-Lady-Of-The-Rings---Scene-1.html), in a manner which permitted and/or allowed the user to copy the
24 embedded code of the Plaintiff film and thereafter display the film in any manner or
25 location desired by the user. This copyrighted work was displayed in this manner
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3 authorization for such display.

4 336. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Paintball Warriors, Copyright Registration
6 Number PA1-675-815, specifically located at [http://www.tjoob.com/search/paintball-](http://www.tjoob.com/search/paintball-warriors/)
7 [warriors/](http://www.tjoob.com/search/paintball-warriors/). This copyrighted work was displayed in this manner without the consent
8 of, or licensing by, Fraserside, the copyright owner and registrant of the motion
9 picture. The Content Licensing Agreement specifically prohibited MetaInterface's
10 display in this manner or MetaInterfaces permission and/or authorization for such
11 display.

12 337. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled Paintball Warriors, Copyright Registration
14 Number PA1-675-815, specifically located at [http://www.tjoob.com/search/paintball-](http://www.tjoob.com/search/paintball-warriors/)
15 [warriors/](http://www.tjoob.com/search/paintball-warriors/), in a manner which permitted and/or allowed the user to copy the embedded
16 code of the Plaintiff film and thereafter display the film in any manner or location
17 desired by the user. This copyrighted work was displayed in this manner without the
18 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
19 motion picture. The Content Licensing Agreement specifically prohibited
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21 authorization for such display.

22 338. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Paintball Warriors, Copyright Registration
24 Number PA1-675-815, specifically located at
25 <http://www.tjoob.com/vids/57789/diana-gold-Paintball-Warriors.html>. This
26 copyrighted work was displayed in this manner without the consent of, or licensing

1 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
2 Licensing Agreement specifically prohibited MetaInterface's display in this manner
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4 339. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Paintball Warriors, Copyright Registration
6 Number PA1-675-815, specifically located at
7 <http://www.tjoob.com/vids/57789/diana-gold-Paintball-Warriors.html>, in a manner
8 which permitted and/or allowed the user to copy the embedded code of the Plaintiff
9 film and thereafter display the film in any manner or location desired by the user.
10 This copyrighted work was displayed in this manner without the consent of, or
11 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
12 The Content Licensing Agreement specifically prohibited MetaInterface's display in
13 this manner or MetaInterfaces permission and/or authorization for such display.

14 340. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
16 PA1-670-904, specifically located at <http://www.tjoob.com/search/psychoporn/>. This
17 copyrighted work was displayed in this manner without the consent of, or licensing
18 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
19 Licensing Agreement specifically prohibited MetaInterface's display in this manner
20 or MetaInterfaces permission and/or authorization for such display.

21 341. In May 2010, www.tjoob.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
23 PA1-670-904, specifically located at <http://www.tjoob.com/search/psychoporn/>, in a
24 manner which permitted and/or allowed the user to copy the embedded code of the
25 Plaintiff film and thereafter display the film in any manner or location desired by the
26 user. This copyrighted work was displayed in this manner without the consent of, or

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4 342. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
6 PA1-670-904, specifically located at [http://www.tjoob.com/vids/67879/liliane-tiger-](http://www.tjoob.com/vids/67879/liliane-tiger-Psychoporn.html)
7 [Psychoporn.html](http://www.tjoob.com/vids/67879/liliane-tiger-Psychoporn.html). This copyrighted work was displayed in this manner without the
8 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
9 motion picture. The Content Licensing Agreement specifically prohibited
10 MetaInterface's display in this manner or MetaInterfaces permission and/or
11 authorization for such display.

12 343. In May 2010, www.tjoob.com displayed and offered for viewing
13 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
14 PA1-670-904, specifically located at [http://www.tjoob.com/vids/67879/liliane-tiger-](http://www.tjoob.com/vids/67879/liliane-tiger-Psychoporn.html)
15 [Psychoporn.html](http://www.tjoob.com/vids/67879/liliane-tiger-Psychoporn.html), in a manner which permitted and/or allowed the user to copy the
16 embedded code of the Plaintiff film and thereafter display the film in any manner or
17 location desired by the user. This copyrighted work was displayed in this manner
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22 344. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
24 PA1-670-904, specifically located at [http://www.tjoob.com/vids/67848/melissa-](http://www.tjoob.com/vids/67848/melissa-black-Psychoporn.html)
25 [black-Psychoporn.html](http://www.tjoob.com/vids/67848/melissa-black-Psychoporn.html). This copyrighted work was displayed in this manner without
26 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the

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4 345. In May 2010, www.tjoob.com displayed and offered for viewing
5 Fraserside's copyrighted work titled Psychoporn, Copyright Registration Number
6 PA1-670-904, specifically located at [http://www.tjoob.com/vids/67848/melissa-](http://www.tjoob.com/vids/67848/melissa-black-Psychoporn.html)
7 [black-Psychoporn.html](http://www.tjoob.com/vids/67848/melissa-black-Psychoporn.html), in a manner which permitted and/or allowed the user to copy
8 the embedded code of the Plaintiff film and thereafter display the film in any manner
9 or location desired by the user. This copyrighted work was displayed in this manner
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13 authorization for such display.

14 346. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled Sex, Lies & Internet, Copyright Registration
16 Number PA1-673-407, specifically located at [http://www.tjoob.com/search/SEX,-](http://www.tjoob.com/search/SEX,-LIES-/playtime-0/)
17 [LIES-/playtime-0/](http://www.tjoob.com/search/SEX,-LIES-/playtime-0/). This copyrighted work was displayed in this manner without the
18 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
19 motion picture. The Content Licensing Agreement specifically prohibited
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22 347. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Sex, Lies & Internet, Copyright Registration
24 Number PA1-673-407, specifically located at [http://www.tjoob.com/search/SEX,-](http://www.tjoob.com/search/SEX,-LIES-/playtime-0/)
25 [LIES-/playtime-0/](http://www.tjoob.com/search/SEX,-LIES-/playtime-0/), in a manner which permitted and/or allowed the user to copy the
26 embedded code of the Plaintiff film and thereafter display the film in any manner or

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5 authorization for such display.

6 348. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled Sex, Lies & Internet, Copyright Registration
8 Number PA1-673-407, specifically located at
9 <http://www.tjoob.com/vids/56758/sandra-iron-Sex-Lies-And-Internet.html>. This
10 copyrighted work was displayed in this manner without the consent of, or licensing
11 by, Fraserside, the copyright owner and registrant of the motion picture. The Content
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14 349. In May 2010, www.tjoob.com displayed and offered for viewing
15 Fraserside's copyrighted work titled Sex, Lies & Internet, Copyright Registration
16 Number PA1-673-407, specifically located at
17 <http://www.tjoob.com/vids/56758/sandra-iron-Sex-Lies-And-Internet.html>, in a
18 manner which permitted and/or allowed the user to copy the embedded code of the
19 Plaintiff film and thereafter display the film in any manner or location desired by the
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22 The Content Licensing Agreement specifically prohibited MetaInterface's display in
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24 350. In May 2010, www.tjoob.com displayed and offered for viewing
25 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
26 PA1-672-445, specifically located at <http://www.tjoob.com/search/sexy->

1 business/playtime-0/. This copyrighted work was displayed in this manner without
2 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the
3 motion picture. The Content Licensing Agreement specifically prohibited
4 MetaInterface's display in this manner or MetaInterfaces permission and/or
5 authorization for such display.

6 351. In May 2010, www.tjoob.com displayed and offered for viewing
7 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
8 PA1-672-445, specifically located at [http://www.tjoob.com/search/sexy-](http://www.tjoob.com/search/sexy-business/playtime-0/)
9 business/playtime-0/, in a manner which permitted and/or allowed the user to copy
10 the embedded code of the Plaintiff film and thereafter display the film in any manner
11 or location desired by the user. This copyrighted work was displayed in this manner
12 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
13 of the motion picture. The Content Licensing Agreement specifically prohibited
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15 authorization for such display.

16 352. In May 2010, www.tjoob.com displayed and offered for viewing
17 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
18 PA1-672-445, specifically located at [http://www.tjoob.com/vids/89438/poppy-](http://www.tjoob.com/vids/89438/poppy-morgan-Sexy-Business.html)
19 morgan-Sexy-Business.html. This copyrighted work was displayed in this manner
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24 353. In May 2010, www.tjoob.com displayed and offered for viewing
25 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
26 PA1-672-445, specifically located at <http://www.tjoob.com/vids/89438/poppy->

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8 354. In May 2010, www.tjoob.com displayed and offered for viewing
9 Fraserside's copyrighted work titled Sexy Business, Copyright Registration Number
10 PA1-672-445, specifically located at [http://www.tjoob.com/vids/89945/jessica-dee-](http://www.tjoob.com/vids/89945/jessica-dee-Sexy-Business.html)
11 [Sexy-Business.html](http://www.tjoob.com/vids/89945/jessica-dee-Sexy-Business.html). This copyrighted work was displayed in this manner without
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18 PA1-672-445, specifically located at [http://www.tjoob.com/vids/89945/jessica-dee-](http://www.tjoob.com/vids/89945/jessica-dee-Sexy-Business.html)
19 [Sexy-Business.html](http://www.tjoob.com/vids/89945/jessica-dee-Sexy-Business.html), in a manner which permitted and/or allowed the user to copy the
20 embedded code of the Plaintiff film and thereafter display the film in any manner or
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26

1 356. In May 2010, www.tjoob.com displayed and offered for viewing
2 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
3 PA1-670-902, specifically located at [http://www.tjoob.com/search/spread-my-](http://www.tjoob.com/search/spread-my-lips/playtime-0/)
4 [lips/playtime-0/](http://www.tjoob.com/search/spread-my-lips/playtime-0/). This copyrighted work was displayed in this manner without the
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11 PA1-670-902, specifically located at [http://www.tjoob.com/search/spread-my-](http://www.tjoob.com/search/spread-my-lips/playtime-0/)
12 [lips/playtime-0/](http://www.tjoob.com/search/spread-my-lips/playtime-0/), in a manner which permitted and/or allowed the user to copy the
13 embedded code of the Plaintiff film and thereafter display the film in any manner or
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18 authorization for such display.

19 358. In May 2010, www.tjoob.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
21 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54613/electra-angel-](http://www.tjoob.com/vids/54613/electra-angel-and-katy-caro-Spread-My-Lips.html)
22 [and-katy-caro-Spread-My-Lips.html](http://www.tjoob.com/vids/54613/electra-angel-and-katy-caro-Spread-My-Lips.html). This copyrighted work was displayed in this
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3 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54613/electra-angel-](http://www.tjoob.com/vids/54613/electra-angel-and-katy-caro-Spread-My-Lips.html)
4 [and-katy-caro-Spread-My-Lips.html](http://www.tjoob.com/vids/54613/electra-angel-and-katy-caro-Spread-My-Lips.html), in a manner which permitted and/or allowed the
5 user to copy the embedded code of the Plaintiff film and thereafter display the film in
6 any manner or location desired by the user. This copyrighted work was displayed in
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10 and/or authorization for such display.

11 360. In May 2010, www.tjoob.com displayed and offered for viewing
12 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
13 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54740/rebecca-](http://www.tjoob.com/vids/54740/rebecca-linares-Spread-My-Lips.html)
14 [linares-Spread-My-Lips.html](http://www.tjoob.com/vids/54740/rebecca-linares-Spread-My-Lips.html). This copyrighted work was displayed in this manner
15 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
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17 MetaInterface's display in this manner or MetaInterfaces permission and/or
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19 361. In May 2010, www.tjoob.com displayed and offered for viewing
20 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
21 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54740/rebecca-](http://www.tjoob.com/vids/54740/rebecca-linares-Spread-My-Lips.html)
22 [linares-Spread-My-Lips.html](http://www.tjoob.com/vids/54740/rebecca-linares-Spread-My-Lips.html), in a manner which permitted and/or allowed the user to
23 copy the embedded code of the Plaintiff film and thereafter display the film in any
24 manner or location desired by the user. This copyrighted work was displayed in this
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3 362. In May 2010, www.tjoob.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
5 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54623/ellen-saint-](http://www.tjoob.com/vids/54623/ellen-saint-Spread-My-Lips.html)
6 [Spread-My-Lips.html](http://www.tjoob.com/vids/54623/ellen-saint-Spread-My-Lips.html). This copyrighted work was displayed in this manner without
7 the consent of, or licensing by, Fraserside, the copyright owner and registrant of the
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13 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54623/ellen-saint-](http://www.tjoob.com/vids/54623/ellen-saint-Spread-My-Lips.html)
14 [Spread-My-Lips.html](http://www.tjoob.com/vids/54623/ellen-saint-Spread-My-Lips.html), in a manner which permitted and/or allowed the user to copy
15 the embedded code of the Plaintiff film and thereafter display the film in any manner
16 or location desired by the user. This copyrighted work was displayed in this manner
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21 364. In May 2010, www.tjoob.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
23 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54838/alejandra-](http://www.tjoob.com/vids/54838/alejandra-maderos-Spread-My-Lips.html)
24 [maderos-Spread-My-Lips.html](http://www.tjoob.com/vids/54838/alejandra-maderos-Spread-My-Lips.html). This copyrighted work was displayed in this manner
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3 365. In May 2010, www.tjoob.com displayed and offered for viewing
4 Fraserside's copyrighted work titled Spread My Lips, Copyright Registration Number
5 PA1-670-902, specifically located at [http://www.tjoob.com/vids/54838/alejandra-](http://www.tjoob.com/vids/54838/alejandra-maderos-Spread-My-Lips.html)
6 [maderos-Spread-My-Lips.html](http://www.tjoob.com/vids/54838/alejandra-maderos-Spread-My-Lips.html), in a manner which permitted and/or allowed the user
7 to copy the embedded code of the Plaintiff film and thereafter display the film in any
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13 366. In May 2010, www.tjoob.com displayed and offered for viewing
14 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
15 PA1-670-893, specifically located at [http://www.tjoob.com/search/tropical-](http://www.tjoob.com/search/tropical-twins/playtime-0/)
16 [twins/playtime-0/](http://www.tjoob.com/search/tropical-twins/playtime-0/). This copyrighted work was displayed in this manner without the
17 consent of, or licensing by, Fraserside, the copyright owner and registrant of the
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21 367. In May 2010, www.tjoob.com displayed and offered for viewing
22 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
23 PA1-670-893, specifically located at [http://www.tjoob.com/search/tropical-](http://www.tjoob.com/search/tropical-twins/playtime-0/)
24 [twins/playtime-0/](http://www.tjoob.com/search/tropical-twins/playtime-0/), in a manner which permitted and/or allowed the user to copy the
25 embedded code of the Plaintiff film and thereafter display the film in any manner or
26 location desired by the user. This copyrighted work was displayed in this manner

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5 368. In May 2010, www.tjoob.com displayed and offered for viewing
6 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
7 PA1-670-893, specifically located at [http://www.tjoob.com/vids/89669/sharka-blue-](http://www.tjoob.com/vids/89669/sharka-blue-and-liliane-tiger-Tropical-Twins.html)
8 [and-liliane-tiger-Tropical-Twins.html](http://www.tjoob.com/vids/89669/sharka-blue-and-liliane-tiger-Tropical-Twins.html). This copyrighted work was displayed in this
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14 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
15 PA1-670-893, specifically located at [http://www.tjoob.com/vids/89669/sharka-blue-](http://www.tjoob.com/vids/89669/sharka-blue-and-liliane-tiger-Tropical-Twins.html)
16 [and-liliane-tiger-Tropical-Twins.html](http://www.tjoob.com/vids/89669/sharka-blue-and-liliane-tiger-Tropical-Twins.html), in a manner which permitted and/or allowed
17 the user to copy the embedded code of the Plaintiff film and thereafter display the
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23 370. In May 2010, www.tjoob.com displayed and offered for viewing
24 Fraserside's copyrighted work titled Tropical Twins, Copyright Registration Number
25 PA1-670-893, specifically located at [http://www.tjoob.com/vids/89650/melany-jolie-](http://www.tjoob.com/vids/89650/melany-jolie-Tropical-Twins.html)
26 [Tropical-Twins.html](http://www.tjoob.com/vids/89650/melany-jolie-Tropical-Twins.html). This copyrighted work was displayed in this manner without

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7 PA1-670-893, specifically located at [http://www.tjoob.com/vids/89650/melany-jolie-](http://www.tjoob.com/vids/89650/melany-jolie-Tropical-Twins.html)
8 [Tropical-Twins.html](http://www.tjoob.com/vids/89650/melany-jolie-Tropical-Twins.html), in a manner which permitted and/or allowed the user to copy
9 the embedded code of the Plaintiff film and thereafter display the film in any manner
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14 authorization for such display.

15 372. In May 2010, www.tjoob.com displayed and offered for viewing
16 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
17 670-897, specifically located at <http://www.tjoob.com/search/tenerife/playtime-0/>.
18 This copyrighted work was displayed in this manner without the consent of, or
19 licensing by, Fraserside, the copyright owner and registrant of the motion picture.
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22 373. In May 2010, www.tjoob.com displayed and offered for viewing
23 Fraserside's copyrighted work titled Tenerife, Copyright Registration Number PA1-
24 670-897, specifically located at <http://www.tjoob.com/search/tenerife/playtime-0/>, in
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5 374. In May 2010, www.tjoob.com displayed and offered for viewing
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7 670-897, specifically located at [http://www.tjoob.com/vids/89516/jane-darling-and-](http://www.tjoob.com/vids/89516/jane-darling-and-silvia-saint-Tenerife.html)
8 [silvia-saint-Tenerife.html](http://www.tjoob.com/vids/89516/jane-darling-and-silvia-saint-Tenerife.html). This copyrighted work was displayed in this manner
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15 670-897, specifically located at [http://www.tjoob.com/vids/89516/jane-darling-and-](http://www.tjoob.com/vids/89516/jane-darling-and-silvia-saint-Tenerife.html)
16 [silvia-saint-Tenerife.html](http://www.tjoob.com/vids/89516/jane-darling-and-silvia-saint-Tenerife.html), in a manner which permitted and/or allowed the user to
17 copy the embedded code of the Plaintiff film and thereafter display the film in any
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25 670-897, specifically located at [http://www.tjoob.com/vids/89949/jane-darling-](http://www.tjoob.com/vids/89949/jane-darling-Tenerife.html)
26 [Tenerife.html](http://www.tjoob.com/vids/89949/jane-darling-Tenerife.html). This copyrighted work was displayed in this manner without the

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5 377. In May 2010, www.tjoob.com displayed and offered for viewing
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7 670-897, specifically located at [http://www.tjoob.com/vids/89949/jane-darling-](http://www.tjoob.com/vids/89949/jane-darling-Tenerife.html)
8 [Tenerife.html](http://www.tjoob.com/vids/89949/jane-darling-Tenerife.html), in a manner which permitted and/or allowed the user to copy the
9 embedded code of the Plaintiff film and thereafter display the film in any manner or
10 location desired by the user. This copyrighted work was displayed in this manner
11 without the consent of, or licensing by, Fraserside, the copyright owner and registrant
12 of the motion picture. The Content Licensing Agreement specifically prohibited
13 MetaInterface's display in this manner or MetaInterfaces permission and/or
14 authorization for such display.

15 378. In May 2010, on its Internet Web site page, specifically located at
16 [http://www.tjoob.com/vids/59494/dorothy-black-and-rita-faltoyano-and-tina-t-](http://www.tjoob.com/vids/59494/dorothy-black-and-rita-faltoyano-and-tina-t-Gladiator.html)
17 [Gladiator.html](http://www.tjoob.com/vids/59494/dorothy-black-and-rita-faltoyano-and-tina-t-Gladiator.html), www.tjoob.com displayed and/or utilized Plaintiff's trademarks
18 PRIVATE, Registration Number 1014957. Plaintiff's trademarks were infringed in
19 this manner as they were displayed without the consent of, or licensing by, the
20 Plaintiff, the trademark owner and registrant of the trademark.

21
22 **COUNT I**
23 **(Copyright Infringement, 17 U.S.C § 501 et seq.)**

24 379. Plaintiff repeats, realleges, and incorporates by this reference each and
25 every preceding allegation set forth herein.
26

1 380. Plaintiff is the sole owner of all right, title, and interest in and to each of
2 the digital motion pictures referenced herein and covered by Plaintiff's registered
3 copyrights, and of all corresponding copyrights and Certificates of Registration.

4 381. Plaintiff's copyrighted works consists of material original to the Plaintiff
5 and each is copyrightable subject matter.

6 382. Defendant has copied, reproduced, distributed, adapted, and/or publicly
7 displayed the Plaintiff's copyrighted works without the consent or authority of the
8 Plaintiff, thereby directly infringing Plaintiff's copyrights.

9 383. Defendant's conduct constitutes infringement of Plaintiff's copyrights
10 and exclusive rights under copyright in violation of 17 U.S.C. §§ 106 and 501 *et seq.*

11 384. The infringement of Plaintiff's rights in and to each of the digital motion
12 pictures constitutes a separate and distinct act of infringement.

13
14 385. The acts of infringement by Defendant have been willful, intentional,
15 and purposeful, in reckless disregard of and with indifference to the rights of
16 Plaintiff.

17 386. As a direct and proximate result of its unlawful conduct, Defendant is
18 liable to Plaintiff for copyright infringement. Plaintiff has suffered, and will continue
19 to suffer, substantial losses, including, but not limited to, damage to its business
20 reputation and goodwill. Plaintiff is entitled to recover damages, which include its
21 losses and all profits Defendants has made as a result of its wrongful conduct,
22 pursuant to 17 U.S.C. § 504(b).

23 387. Alternative to actual damages plus Defendant's profits, Plaintiff is
24 entitled to the maximum statutory damages, pursuant to 17 U.S.C. § 504(c), in the
25 amount of \$150,000 for each infringed motion picture, or other such amounts as may
26 be proper pursuant to 17 U.S.C. § 504(c).

388. Defendant's conduct has caused and, unless enjoined and restrained by this court, will continue to cause irreparable injury to Plaintiff for which Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiff is entitled to injunctive relief prohibiting further infringements of Plaintiff's copyrights.

389. Defendant is continuing its infringement in blatant disregard of Plaintiff's protected rights.

390. Plaintiff is also entitled to recover their attorneys' fees and costs of suit, pursuant to 17 U.S.C. § 505.

COUNT II

(Contributory Copyright Infringement, 17 U.S.C. § 501 et seq.)

391. Plaintiff repeats, realleges, and incorporates by this reference each and every preceding allegation set forth herein.

392. Defendant has engaged in the business of knowingly inducing, causing, and/or materially contributing to unauthorized reproduction, adaptation, public display, and/or distribution of copies of the Plaintiff's copyrighted works, and thus to the direct infringement of the Plaintiff's copyrighted motion pictures.

393. Defendant's conduct constitutes contributory infringement of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's copyrighted works in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

394. The infringement of Plaintiff's rights in and to each of the Plaintiff's copyrighted works constitutes a separate and distinct infringement.

395. The acts of infringement by Defendant have been willful, intentional, and purposeful, in reckless disregard of and with indifference to Plaintiff's rights.

396. As a direct and proximate result of the infringements by Defendant of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's

1 copyrighted works, Plaintiff is entitled to its actual damages and Defendant's profits
2 pursuant to 17 U.S.C. § 504(b).

3 397. Alternatively, Plaintiff is entitled to maximum statutory damages,
4 pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each work
5 infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).

6 398. Plaintiff further is entitled to their attorneys' fees and full costs pursuant
7 to 17 U.S.C. § 505.

8 9 **COUNT III**

10 **(Trademark Infringement Under the Lanham Act – 15 U.S.C. §1114)**

11 399. Plaintiff repeats, realleges, and incorporates by this reference each and
12 every preceding allegation set forth herein.

13 400. Defendant's use of Plaintiff's registered PRIVATE trademark and
14 service mark in a manner likely to create consumer confusion, as alleged herein,
15 constitutes trademark infringement pursuant to 15 U.S.C. §1114.

16 401. Defendant's infringement is intentional and willful, and has caused and
17 will continue to cause damage to Plaintiff in an amount to be proven at trial, and is
18 causing irreparable harm to Plaintiff for which there is no adequate remedy at law.
19 Plaintiff is entitled to statutory and treble damages.

20 21 **COUNT IV**

22 **(False Designation of Origin Under the Lanham Act – 15 U.S.C §1125(a))**

23 402. Plaintiff repeats, realleges, and incorporates by this reference each and
24 every preceding allegation set forth herein..
25
26

403. Defendant's conduct is likely to cause confusion, mistake, or deception as to defendant's affiliations, connection, or association with Plaintiff, or as to the origin, sponsorship, or approval of their goods or commercial activities.

404. Defendant's conduct as alleged herein, including but not necessarily limited to their use of the PRIVATE mark, constitutes false designation of origin pursuant to 15 U.S.C. §1125(a).

405. Plaintiff has been damaged by these acts in an amount to be proved at trial. Plaintiff is also entitled under the Lanham Act to injunctive and equitable relief against defendants.

COUNT V

(Unfair Competition Under the Lanham Act – 15 U.S.C. § 1125(a))

406. Plaintiff repeats, realleges, and incorporates by this reference each and every preceding allegation set forth herein.

407. Defendant's conduct as alleged herein, including but not limited to falsely representing that they are somehow affiliated, connected, or associated with Plaintiff or falsely to imply that Plaintiff has created, sponsors, or otherwise approves of their websites constitutes unfair competition and false advertising pursuant to 15 U.S.C. § 1125(a).

408. Plaintiff has been damaged by these acts in an amount to be proved at trial. Plaintiff is also entitled under the Lanham Act to injunctive and equitable relief against Defendant.

COUNT VI

(Accounting)

409. Plaintiff repeats, realleges, and incorporates by this reference each and every preceding allegation set forth herein.

COUNT VII
(Constructive Trust)

413. As a result of Defendant's wrongful conduct alleged herein, Defendant, has been unjustly enriched at the expense of Plaintiff, and will very likely continue to receive money and/or other valuable consideration and benefits in the future based thereon.

414. Plaintiff is entitled to an accounting from Defendant of all revenue and profits earned and received by Defendant, in connection with the wrongful conduct alleged herein. The accounting will show any profits now due and owing to Plaintiff based thereon. Plaintiff is further entitled to injunctive relieve against Defendant, and each of them, restraining them from transferring such funds during the pendency of this action, so that meaningful equitable relief may be obtained upon entry of a judgment herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully request judgment as follows:

1. That the Court enter a judgment against the Defendant that it has willfully infringed Plaintiff's rights in its federally registered copyrights in violation of 17 U.S.C. § 501.

2. That this Court enter judgment against Defendant for unfair methods of competition in violation of state common law.

3. That the Court issue injunctive relief against Defendant, and the Defendant, their officers, agents, representatives, servants, employees, attorneys, successors and assigns, and all others in active concert and/or participation with the Defendant, be enjoined and restrained from display and distribution of Plaintiff's motion pictures.

4. That the Court issue temporary and permanent injunctive relief against the Defendant, and that the Defendant, their officers, agents, representative, servants, employees, attorneys, successors and assignees, and all other in active concert or participation with the Defendant, be enjoined and restrained from copying, reproducing, distributing, adapting, and/or publicly displaying Plaintiff's copyrighted works without the consent or authority of the Plaintiff.

5. That the Court enter an order of impoundment pursuant to 17 U.S.C. §§ 503 and 509(a) impounding all infringing copies of Plaintiff's motion pictures.

6. That the Court issue temporary and permanent injunctive relief against Defendant, and that Defendant, its officers, agents, representative, servants, employees, attorneys, successors and assignees, and all other in active concert or participation with Defendant, be enjoined and restrained from:

a) infringing Plaintiff's trademark and service mark;

- 1 b) advertising their products in a manner that falsely suggests that
2 their products are somehow affiliated, connected, or associated
3 with Plaintiff or falsely imply that Plaintiff, has created, sponsors,
4 or otherwise approves the products;
5 c) assisting, aiding, or abetting any other person or business in
6 engaging in or performing any of the activities referred to in
7 paragraph a) through b) above;

8 7. That the Court award Plaintiff actual damages and profits of Defendant
9 in an amount to be proved at trial and/or statutory damages;

10 8. That the Court award Plaintiff its attorneys' fees and costs incurred
11 herein;

12 9. That the Court enter an order declaring that the Defendant hold in trust,
13 as constructive trustees for the benefit of Plaintiff, their illegal profits obtained from
14 their copying, reproduction, distribution, adaptation, and/or public display of
15 Plaintiff's copyrighted works without the consent or authority of the Plaintiff.
16

17 10. That the Court enter an order requiring the Defendants to provide to
18 Plaintiff a full and complete accounting of all gross revenue obtained from their
19 copying, reproduction, distribution, adaptation, and/or public display of Plaintiff's
20 copyrighted works and of any other amounts due and owing to Plaintiff as a result of
21 the Defendant's illegal activities.

22 11. That the Court order the Defendant to pay Plaintiff's damages and
23 Defendant's profits pursuant to 17 U.S.C. § 504(b), or, alternatively, enhanced
24 statutory damages pursuant to 17 U.S.C. § 504(c) and 17 U.S.C. § 504(c)(2), for the
25 Defendant's willful infringement of Plaintiff's copyrights.
26

1 12. That the Court order Defendant to pay to Plaintiff both the costs of this
2 suit and the reasonable attorneys' fees incurred by Plaintiff in investigating and
3 prosecuting this action.

4 13. For all costs of suit; and

5 14. That the Court grant to Plaintiffs such other and additional relief as is
6 just and proper.

7
8 August 12, 2010.

9 Respectfully submitted,
10 DILLON & GERARDI

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15 THE FREEMAN LAW FIRM INC.

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